

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

February 16, 2022

FOR: Kimberly M. Zeich

Executive Director (Acting)
U.S. AbilityOne Commission

FROM: Rosario A. Torres, CIA, CGAP

Assistant Inspector General for Audit

U.S. AbilityOne Commission

SUBJECT: Quarterly Audit Recommendation Status Report (1st Quarter, FY2022)

We are pleased to provide the Office of Inspector General (OIG) Quarterly Audit Recommendation Status Report. As of December 31<sup>st</sup>, 2021, there are 67 open recommendations, 8 of which were reported as "implemented" by management; and none of the remaining 59 categorized as "Overdue." Since the date of the OIG's last recommendation status report, dated September 30<sup>th</sup>, 2021, 16 new recommendations were added, and 9 recommendations were closed.

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

Enclosure: Quarterly Audit Recommendation Status Report

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

Kelvin R. Wood Chief of Staff U.S. AbilityOne Commission

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

Edward Yang Chief Information Officer U.S. AbilityOne Commission



CliftonLarsonAllen LLP 6406 Ivy Lane, Suite 200 Greenbelt, MD 20770

phone 301-931-2050 fax 301-931-1710 CLAconnect.com

February 15, 2022

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

Dear Mr. Torres:

Enclosed is the Quarterly Audit Recommendation Status Report for the U.S. AbilityOne Commission (Commission) as of December 31, 2021. CliftonLarsonAllen LLP (CLA) prepared this report based on the listing and analysis of the status of open recommendations included in our September 30, 2021 quarterly report to the Office of Inspector General (OIG) for the Commission and updated for activity from that date to December 31, 2021. A summary of the source of the open recommendations as of December 31, 2021, and the responsible Audit Follow-Up Official (AFO) at the Commission is presented below in *Figure 1*.

Figure 1: Summary of Open Audit Recommendations

| Source   | Number of Open<br>Recommendations | Audit Follow-Up<br>Official <sup>1</sup> |
|--|-----------------------------------|--|
| Performance Audits   | 30                                | PMO                                      |
| Federal Information Security Modernization Act (FISMA) Evaluations | 3                                 | CIO                                      |
| Audited Financial Statements                                       | 34                                | CFO                                      |
| Total  | 67                                |  |

Source: CLA analysis of status of open audit recommendations

As of December 31, 2021, there are 67 open recommendations (see *Table 1* in the enclosed report), 8 of which were reported as implemented by management but remain open per third-party (CLA/other Independent Public Accounting firm (IPA)/OIG) determination; and none of the remaining 59 were considered "Overdue."<sup>2</sup>

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



<sup>&</sup>lt;sup>1</sup> Legend for Audit Follow-Up Official is as follows:

CFO - Office of the Chief Financial Officer

CIO - Office of the Chief Information Officer

PMO - Director of the Program Management Office

As of September 30, 2021, the date of CLA's second Quarterly Audit Recommendation Status Report for the Commission, there were 58 open recommendations reported. However, the IPA for the Commission's financial statement audits subsequently reported an adjustment to increase the number of open recommendations by two as of that date. This adjustment resulted in a revised total of 60 open recommendations as of September 30, 2021.

Since September 30, 2021, 16 new recommendations<sup>3</sup> were added, and 9 recommendations were closed (see *Table 2* in the enclosed report).

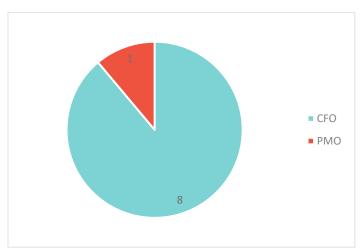
A summary of new recommendations by the responsible AFO is presented in Figure 2 below.

16 — 15
14 — 10
8 — 6 — 4 — 1 — 0
CFO CIO

Figure 2: Summary of New Recommendations

Source: CLA analysis of new audit recommendations

A summary of closed recommendations by the responsible AFO is presented in Figure 3 below.



**Figure 3: Summary of Closed Recommendations** 

Source: CLA analysis of closed audit recommendations

<sup>&</sup>lt;sup>3</sup> New recommendations exclude those that were a repeat finding from the prior year(s). A notation is included in *Table 1* of the enclosed report to identify repeat findings.

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

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

Further details on the actions taken by the responsible AFO regarding the open audit recommendations are presented in *Figure 4* below.

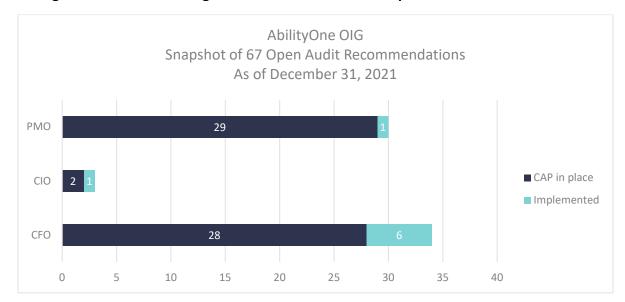


Figure 4: Status of Management's Actions Taken for Open Audit Recommendations

Source: CLA analysis of status of open audit recommendations

- 1) The Director of the PMO, CIO, and CFO submitted corrective action plans (CAPs) for 59<sup>4</sup> recommendations. As of December 31, 2021, implementation of none of these 59 CAPs is considered "Overdue."
- 2) The Director of the PMO, CIO, and CFO reported eight recommendations as "Implemented." As discussed above, these recommendations remain open until CLA or other responsible IPA obtains and reviews supporting documentation submitted to support their assertion.

<sup>&</sup>lt;sup>4</sup> During this reporting period, the target completion date was extended past December 31, 2021 for 6 recommendations by the CFO, 2 recommendations by the CIO, and for 19 recommendations by the Director of the PMO.

U.S. AbilityOne Commission February 15, 2022 Page 4

Please contact me with any questions on the information provided.

Sincerely,

CliftonLarsonAllen LLP

Temberly kenn

Kimberly Penn, CPA

Principal 301-902-8586

Kimberly.Penn@claconnect.com

Enclosure

Table 1: Open as of December 31, 2021

| Seq. | Report Short                         | Recommendation |  | Target Completion Date (Per | Current | Responsible         | Recommendation<br>Progress |
|------|--------------------------------------|----------------|--|-----------------------------|---------|---------------------|----------------------------|
| No.  | Name                                 | Number         | Recommendation   | Agency)                     | Status  | Office <sup>1</sup> | (Per Agency)               |
| 1    | FY 2020 Financial<br>Statement Audit | CFO-2020-01    | Continue to gain knowledge of OMB Circular A-136 and other authoritative guidance relating to financial reporting requirements to better oversee the performance of its shared service provider and to ensure that its reporting requirements are being fulfilled, including those relating to the submission of interim financial statements and footnotes and the proper recording and reporting of loss contingencies (Repeat finding from 2019 Financial Statement Audit). | 8/31/2022                   | Open    | CFO                 | Implemented                |
| 2    | FY 2020 Financial<br>Statement Audit | CFO-2020-02    | Advise the service provider that outdated/superseded guidance was used in the preparation of its financial statements and footnotes so that this issue can be addressed by the service provider in the future (Repeat finding from 2019 Financial Statement Audit).  | 8/31/2022                   | Open    | CFO                 | Implemented                |
| 3    | FY 2020 Financial<br>Statement Audit | CFO-2020-03    | Request that the service provider enhance its current review procedures to identify errors and omissions in the required financial statements and footnotes and to ensure that all required presentation and disclosure  | 8/31/2022                   | Open    | CFO                 | Implemented                |

<sup>&</sup>lt;sup>1</sup> Legend for Responsible Office is as follows:

CFO – Office of the Chief Financial Officer

CIO – Office of the Chief Information Officer

PMO – Director of the Program Management Office

| Seq. | Report Short<br>Name                 | Recommendation<br>Number | Recommendation   | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency)     |
|------|--------------------------------------|--------------------------|--|-------------------------------------|-------------------|------------------------------------|--|
|      |                                      |                          | requirements have been met (Repeat finding from 2019 Financial Statement Audit).   |                                     |                   |                                    |  |
| 4    | FY 2020 Financial<br>Statement Audit | CFO-2020-04              | In accordance with generally accepted accounting principles (GAAP), ask the Commission's General Counsel to identify loss contingencies relating to legal matters that should be recorded in the agency's general ledger and/or disclosed in the notes to the financial statements and instruct the service provider to record these entries and/or disclose these amounts, as appropriate (Repeat finding from 2019 Financial Statement Audit). | 8/31/2022                           | Open              | CFO                                | Implemented                              |
| 5    | FY2020 Financial<br>Statement Audit  | CFO-2020-06              | Continue to implement management's corrective action plan, including the filling of vacant positions.  | 8/31/2022                           | Open              | CFO                                | Implemented                              |
| 6    | FY2020 Financial<br>Statement Audit  | CFO-2020-12              | The Commission should continue to implement the actions identified in its corrective action plan relating to employee payroll and benefits, dated September 30, 2020.  | 8/31/2022                           | Open              | CFO                                | Corrective Action<br>Plan (CAP) in place |
| 7    | FY2020 Financial<br>Statement Audit  | CFO-2020-19              | The incoming Chief Financial Officer or other Commission personnel knowledgeable in accounting and finance should work with the service provider to identify, at least quarterly, upward adjustments that have been offset by downward adjustments in the general ledger so that manual adjustments can be recorded to properly state the ending balances of both accounts.  | 9/30/2022                           | Open              | CFO                                | CAP in place                             |

| Seq. | Report Short<br>Name                | Recommendation<br>Number | Recommendation  | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|-------------------------------------|--------------------------|---|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
| 8    | FY2020 Financial<br>Statement Audit | CFO-2020-20              | Commission management should work with its service provider to design and implement policies and procedures which enhance the internal review process for upward and downward adjustment transactions and includes a reconciliation of the UDO balances with the supporting documentation to ensure that transactions have been recorded correctly. | 9/30/2022                           | Open              | CFO                                | CAP in place                         |
| 9    | FY2020 Financial<br>Statement Audit | CFO-2020-21              | The incoming Chief Financial Officer or other Commission personnel knowledgeable in accounting and finance should independently verify the amounts recorded for reimbursable activity by its shared service provider or participate in the calculation of the recorded amounts.   | 6/30/2022                           | Open              | CFO                                | CAP in place                         |
| 10   | FY2020 Financial<br>Statement Audit | CFO-2020-22              | The incoming Chief Financial Officer or other Commission personnel knowledgeable in accounting and finance should develop a procedure to identify accrued liabilities for reimbursable expenses which should be also be recorded as accrued accounts receivable.  | 6/30/2022                           | Open              | CFO                                | CAP in place                         |
| 11   | FY2020 Financial<br>Statement Audit | CFO-2020-23              | Commission management should develop written policies and procedures for the financial reporting process, including procedures to identify and perform (or assist its service provider in preparing) year-end entries to the general ledger that are required by generally accepted accounting principles.  | 6/30/2022                           | Open              | CFO                                | CAP in place                         |

| Seq. | Report Short<br>Name                | Recommendation<br>Number | Recommendation   | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|-------------------------------------|--------------------------|--|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
| 12   | FY2021 Financial<br>Statement Audit | CFO-2021-01              | Develop a procedure to identify and track all on-top adjustments, worksheet adjustments, and other corrections for prior year transactions that were processed during the prior fiscal year, evaluate their effects on current year balances and record them timely (during the first quarter of the fiscal year) in the general ledger. | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 13   | FY2021 Financial<br>Statement Audit | CFO-2021-02              | Review the posting logic that was applied within Pegasys for each correcting entry and record reclassification journal entries in the general ledger using the appropriate general ledger accounts for the correction of errors, in accordance with generally accepted accounting principles.  | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 14   | FY2021 Financial<br>Statement Audit | CFO-2021-03              | Develop a procedure to validate the agency's beginning balances that are rolled forward from the prior year to ensure that valid balances are not eliminated either before or during the closing process.  | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 15   | FY2021 Financial<br>Statement Audit | CFO-2021-04              | Verify that current Treasury and OMB financial reporting requirements and other authoritative guidance is obtained and followed during the preparation and review of the financial statements and footnotes, including all mandatory and presumptively mandatory provisions, as defined in those sources.                                | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 16   | FY2021 Financial<br>Statement Audit | CFO-2021-05              | Reconcile the trial balance to subsidiary or supplementary sources, such as the capitalized  | 7/31/2022                           | Open              | CFO                                | CAP in place                         |

| Seq. | Report Short<br>Name                | Recommendation<br>Number | Recommendation   | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|-------------------------------------|--------------------------|--|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
|      |                                     |                          | expenditure and accrued expense worksheets to the general ledger to validate the balances reported in the trial balance.   |                                     |                   |                                    |                                      |
| 17   | FY2021 Financial<br>Statement Audit | CFO-2021-06              | Increase the precision of existing checklists and variance analysis tools so that changes from known and expected results can be detected and corrected.   | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 18   | FY2021 Financial<br>Statement Audit | CFO-2021-07              | Request and obtain the legal representation letter from the Office of the General Counsel (OGC) or consult with the OGC prior to the close of the reporting period so that any required entries can be recorded, and the Commitment and Contingencies footnote can be prepared and reviewed timely.  | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 19   | FY2021 Financial<br>Statement Audit | CFO-2021-08              | Verify that the information included in the Commitment and Contingencies footnote is clear, concise, accurate, complete, and properly classified according to generally accepted accounting principles and federal reporting requirements and that all contingencies reported in the footnote exist as of the reporting date.  | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 20   | FY2021 Financial<br>Statement Audit | CFO-2021-09              | The Commission should correct and then regularly update a detailed listing of the assets that are reported in the agency's trial balance and financial statements to enable the agency to verify the capitalized property balances reported in the agency's financial statements are correct and are reported in accordance with generally accepted accounting principles. | 7/31/2022                           | Open              | CFO                                | CAP in place                         |

| Seq. | Report Short<br>Name                | Recommendation<br>Number   | Recommendation  | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|-------------------------------------|----------------------------|---|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
| 21   | FY2021 Financial<br>Statement Audit | CFO-2021-10                | The Commission should regularly assess all capitalized property for assets that are no longer in service or to which the agency no longer has legal rights and ensure that these items are removed timely and proactively by Commission management.                   | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 22   | FY2021 Financial<br>Statement Audit | CFO-2021-11                | The Commission should accumulate all expenditures for the leasehold improvements for its new lease, report them as construction in progress, and adjust the balance at the end of each reporting period to reflect the work completed until the project is completed. | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 23   | FY2021 Financial<br>Statement Audit | CFO-2021-12                | The Commission should ensure that the date of service is entered into the Pegasys property module so that depreciation is properly calculated and recorded for all capitalized assets.  | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 24   | FY2021 Financial<br>Statement Audit | CFO-2021-13                | The Commission should update its financial reporting policies and procedures to include the recording of new capitalized purchases, disposals of capitalized property, and depreciation/amortization in accordance with generally accepted accounting principles.     | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 25   | FY2021 Financial<br>Statement Audit | CFO-2021-14<br>CFO-2019-01 | Commission management should develop a procedure to review disbursements made early in the subsequent reporting period to identify items which should be included in its year-end accounts payable or develop an alternative procedure which appropriately estimates  | 6/30/2022                           | Open              | CFO                                | CAP in place                         |

| Seq. | Report Short     | Recommendation |   | Target Completion Date (Per | Current | Responsible         | Recommendation<br>Progress |
|------|------------------|----------------|---|-----------------------------|---------|---------------------|----------------------------|
| No.  | Name             | Number         | Recommendation the amount of these liabilities at year-end (Repeat  | Agency)                     | Status  | Office <sup>1</sup> | (Per Agency)               |
|      |                  |                | finding from 2019 Financial Statement Audit).   |                             |         |                     |                            |
| 26   | FY2021 Financial | CFO-2021-15    | Commission management should independently verify   | 6/30/2022                   | Open    | CFO                 | CAP in place               |
|      | Statement Audit  | CFO-2019-02    | the amounts recorded for accrued liabilities by its   |                             |         |                     | ·                          |
|      |                  |                | shared service provider or participate in the calculation   |                             |         |                     |                            |
|      |                  |                | of the recorded amounts (Repeat finding from 2019   |                             |         |                     |                            |
|      |                  |                | Financial Statement Audit).   |                             |         |                     |                            |
| 27   | FY2021 Financial | CFO-2021-16    | Commission management should develop written  | 6/30/2022                   | Open    | CFO                 | Implemented                |
|      | Statement Audit  | CFO-2020-08    | policies and procedures for the financial reporting   |                             |         |                     |                            |
|      |                  |                | process, including procedures to identify and perform   |                             |         |                     |                            |
|      |                  |                | (or assist its service provider in preparing) year-end  |                             |         |                     |                            |
|      |                  |                | entries to the general ledger that are required by  |                             |         |                     |                            |
|      |                  |                | generally accepted accounting principles (Repeat finding  |                             |         |                     |                            |
| 20   | EV2024 E:        | 050 2024 47    | from 2019 and 2020 Financial Statement Audits).   | 6 (20 (2022                 |         | 050                 | CAR: I                     |
| 28   | FY2021 Financial | CFO-2021-17    | Commission management should develop written  | 6/30/2022                   | Open    | CFO                 | CAP in place               |
|      | Statement Audit  | CFO-2019-03    | policies and procedures which define the roles and  |                             |         |                     |                            |
|      |                  |                | responsibilities of the service provider and Commission staff in performing financial reporting functions (Repeat |                             |         |                     |                            |
|      |                  |                | finding from 2019 Financial Statement Audit).   |                             |         |                     |                            |
| 29   | FY2021 Financial | CFO-2021-18    | The Chief Financial Officer or other personnel  | 6/30/2022                   | Open    | CFO                 | CAP in place               |
|      | Statement Audit  | CFO-2020-09    | knowledgeable in accounting and finance should  | 0,00,2022                   | Opc.,   | 2. 3                | or in place                |
|      |                  | 3. 3 2323 33   | independently verify the amounts recorded for accrued   |                             |         |                     |                            |
|      |                  |                | liabilities and examine the entries that the service  |                             |         |                     |                            |
|      |                  |                | provider has recorded in its general ledger to ensure it  |                             |         |                     |                            |

| Seq. | Report Short<br>Name                | Recommendation<br>Number   | Recommendation  | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|-------------------------------------|----------------------------|---|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
|      |                                     |                            | agrees with the information the Commission has provided (Repeat finding from 2020 Financial Statement Audit).   |                                     |                   |                                    |                                      |
| 30   | FY2021 Financial<br>Statement Audit | CFO-2021-19                | Commission management should enhance its existing policies and procedures to require a more thorough review of its year-end accounting entries to ensure that all required information pertaining to accrued liabilities has been received from all sources and has been recorded in the general ledger in accordance with generally accepted accounting principles.                      | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 31   | FY2021 Financial<br>Statement Audit | CFO-2021-20<br>CFO-2020-10 | The Commission should perform routine reviews of employee benefit elections and Official Personnel Files (OPFs) to ensure they are complete and accurate and address this issue with its shared service provider to ensure that OPM guidance is appropriately followed with respect to the Commission's personnel records (Repeat finding from 2019 and 2020 Financial Statement Audits). | 10/31/2022                          | Open              | CFO                                | CAP in place                         |
| 32   | FY2021 Financial<br>Statement Audit | CFO-2021-21<br>CFO-2020-11 | The Commission should obtain replacement copies of missing records that have been identified and either provide these documents to the service provider so that the information can be maintained in the e-OPF or consider developing and implementing its own repository of documentation to ease the retrieval and  | 8/31/2022                           | Open              | CFO                                | CAP in place                         |

| Seq. | Report Short<br>Name                | Recommendation<br>Number   | Recommendation  | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|-------------------------------------|----------------------------|---|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
|      |                                     |                            | response process (Repeat finding from 2020 Financial Statement Audit).  |                                     |                   |                                    |                                      |
| 33   | FY2021 Financial<br>Statement Audit | CFO-2021-22                | At the end of each pay period or at least monthly, the Commission should review reports of employee benefits election changes made through the employee self-service portal and retain the documentation for all changes in the employees' e-OPF. | 7/31/2022                           | Open              | CFO                                | CAP in place                         |
| 34   | FY2021 Financial<br>Statement Audit | CFO-2021-23<br>CFO-2020-17 | Fulfill the requirements of 31 USC §1517(b) by reporting the FY 2019 and FY 2020 violations to the President, Congress, and the Comptroller General of the United States (Repeat finding from 2020 Financial Statement Audit).                    | 9/30/2022                           | Open              | CFO                                | CAP in place                         |
| 35   | FY2020 FISMA                        | CIO-2020-01                | The Commission should follow their vulnerability remediation policies.  | 2/28/2022                           | Open              | CIO                                | CAP in place                         |
| 36   | FY2021 FISMA                        | CIO-2021-01<br>CIO-2020-02 | Scanning should be run on a monthly basis, however if there are medium, high and/or critical vulnerabilities, then they should be remediated, and the scan should be repeated and run again (Repeat finding from 2020 FISMA Audit).               | 2/28/2022                           | Open              | CIO                                | CAP in place                         |
| 37   | FY2021 FISMA                        | CIO-2021-02                | Update the configuration settings on the servers to be in compliance with Commission IT Policy and ensure only essential capabilities are being provided.   | 3/31/2022                           | Open              | CIO                                | Implemented                          |

| Seq. | Report Short<br>Name           | Recommendation<br>Number | Recommendation   | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|--------------------------------|--------------------------|--|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
| 38   | Program Fee                    | PMO-2020-01              | We recommend the Commission require the Commission Staff to develop and implement effective policy and procedures on the Program Fee Ceiling criteria and methodology for determining the fee ceiling on the CNAs including aligning legacy and draft policy with the criteria in the Cooperative Agreements.  | 7/31/2022                           | Open              | PMO                                | CAP in place                         |
| 39   | Program Fee                    | PMO-2020-02              | The Commission should follow GAO 14-704G, Standards for Internal Control in the Federal Government, Principles 10-15. The principles will assist the Commission to develop, design, and implement timely guidance that is supported by quality information.  | 3/31/2022                           | Open              | PMO                                | CAP in place                         |
| 40   | Program Fee                    | PMO-2020-03              | In order to effectively manage the Program fee, the Commission should complete a workforce analysis to determine Commission staffing requirements based on major mission activities and cross-cutting priority goals.  | 2/28/2022                           | Open              | PMO                                | CAP in place                         |
| 41   | Program Fee                    | PMO-2020-04              | In order to support and inform decision-making processes and ensure effective and greater communication and reporting on the analysis being completed, the Commission should review and analyze the Fee and Expenditure Reports and other materials received from the CNAs for opportunities to use a variety of analytical, research, and evaluation methods. | 3/31/2022                           | Open              | PMO                                | CAP in place                         |
| 42   | Cooperative<br>Agreement Audit | PMO-2020-05              | We recommend the Commission implement better practices for the QASP process that includes additions to the QASP plan or a separate procedure that outlines   | 3/31/2022                           | Open              | РМО                                | CAP in place                         |

| Seq. | Report Short                   | Recommendation | Decommondation  | Target Completion Date (Per | Current | Responsible<br>Office <sup>1</sup> | Recommendation<br>Progress |
|------|--------------------------------|----------------|---|-----------------------------|---------|------------------------------------|----------------------------|
| No.  | Name                           | Number         | how the QASP and KPI measurements are developed and the basis for measurements.   | Agency)                     | Status  | Office <sup>2</sup>                | (Per Agency)               |
| 43   | Cooperative<br>Agreement Audit | PMO-2020-06    | We recommend the Commission to complete a work force analysis to determine staffing requirements based on major mission activities.   | 2/28/2022                   | Open    | PMO                                | CAP in place               |
| 44   | Cooperative<br>Agreement Audit | PMO-2020-07    | We recommend the Commission to ensure the Commission's Agreements are harmonized with compliance enforcement protocol to ensure they are capable of meeting the regulatory requirements of the Agreements by the Commission and CNAs.                           | 12/31/2022                  | Open    | PMO                                | CAP in place               |
| 45   | Cooperative<br>Agreement Audit | PMO-2020-08    | We recommend the Commission review and assess the requirements of the deliverables listed in Section G, attachment 1 of the Agreements, to determine if there are opportunities to reduce the volume and enhance the preparation effectiveness.                 | 3/31/2022                   | Open    | PMO                                | CAP in place               |
| 46   | Cooperative<br>Agreement Audit | PMO-2020-09    | We recommend the Commission to review and analyze the Fee and Expenditure Reports and other materials received from the CNAs for opportunities to use a variety of analytical, research, and evaluation methods to support an informed decision-making process. | 3/31/2022                   | Open    | PMO                                | CAP in place               |
| 47   | Cooperative<br>Agreement Audit | PMO-2020-10    | We recommend the Commission to ensure that responses to follow up questions from CNAs have been addressed and included in the reports prior to sending the Fee and Expenditure Reports to Congress.   | 3/31/2022                   | Open    | PMO                                | CAP in place               |

| Seq. | Report Short<br>Name  | Recommendation<br>Number | Recommendation  | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|---|--------------------------|---|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
| 48   | Cooperative<br>Agreement Audit                                | PMO-2020-11              | We recommend the Commission to ensure the CNAs have access to clear and complete guidance to follow when responding to Commission requests, enforcing the Commission's regulatory requirements, and meeting the requirements of the Agreements.   | 12/31/2022                          | Open              | PMO                                | CAP in place                         |
| 49   | Audit of Project Assignment and Allocation of Orders          | PMO-2021-02              | Update policy 51.301 to include clarifying the meaning of equitable and transparent distributions, consistent with Standards for Internal Controls in the Federal Government and prior GAO recommendations.   | 6/30/2022                           | Open              | PMO                                | CAP in place                         |
| 50   | Audit of Project Assignment and Allocation of Orders          | PMO-2021-03              | Review and address the outstanding issues identified during the Commission's 2017 review to ensure NIB's project assignment policy aligns with Commission policy 51.301.  | 6/30/2022                           | Open              | PMO                                | CAP in place                         |
| 51   | Audit of Project Assignment and Allocation of Orders          | PMO-2021-04              | Ensure that NIB completes its order allocation policy and provide sufficient guidance to NIB to ensure that this policy aligns with Commission policy 51.301.   | 6/30/2022                           | Open              | PMO                                | CAP in place                         |
| 52   | Audit of Project<br>Assignment and<br>Allocation of<br>Orders | PMO-2021-05              | Require the CNAs to include specific criteria for considering the size of NPAs in their recommendation decisions. As part of this, develop metrics for assessing the CNAs on the equitable distribution of projects and monitor progress on an annual basis, consistent with the Standards for Internal Controls in the Federal Government. | 6/30/2022                           | Open              | PMO                                | CAP in place                         |

| Seq. | Report Short<br>Name                                 | Recommendation<br>Number | Recommendation   | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|--|--------------------------|--|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
| 53   | Audit of Project Assignment and Allocation of Orders | PMO-2021-06              | Conduct a study to determine whether a different mix of different sized NPAs could help increase the number of people employed through the program and their total work hours.   | 12/31/2022                          | Open              | РМО                                | CAP in place                         |
| 54   | Audit of Project Assignment and Allocation of Orders | PMO-2021-07              | Identify metrics for assessing transparency and monitor progress on annual basis, consistent with the Standards for Internal Controls in the Federal Government.   | 12/31/2022                          | Open              | PMO                                | CAP in place                         |
| 55   | Audit of Procurement List Additions Process          | PMO-2021-08              | Develop a systematic approach to reviewing and updating policies and procedures every five years as needed in accordance with policy 51.101 including documentation of the review performed, whether updates are needed, and the prioritization of identified updates. | 12/31/2022                          | Open              | PMO                                | CAP in place                         |
| 56   | Audit of<br>Procurement List<br>Additions Process    | PMO-2021-09              | Update D&F policy 51.207 to improve transparency by clearly stating its use, purpose, and implementation including how D&F authority delegated to designated Commission staff is required to be approved by Commission members, documented, and periodically updated.  | 7/31/2022                           | Open              | PMO                                | CAP in place                         |
| 57   | Audit of Procurement List Additions Process          | PMO-2021-10              | Review and evaluate the D&F thresholds, and the eight (8) other criteria for assessing whether using D&F approval authority is appropriate, in determining whether the risk tolerance for the volume of D&F approvals is at an acceptable level.                       | 7/31/2022                           | Open              | PMO                                | CAP in place                         |

| Seq. | Report Short<br>Name                              | Recommendation<br>Number | Recommendation   | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|---|--------------------------|--|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
| 58   | Audit of Procurement List Additions Process       | PMO-2021-11              | Monitor the annual use of D&F authority to include restarting the regular reporting to Commission members about the use of this authority.   | 9/30/2022                           | Open              | PMO                                | CAP in place                         |
| 59   | Audit of<br>Procurement List<br>Additions Process | PMO-2021-12              | Develop comprehensive written documentation of the procedures performed by Commission staff for reviewing and evaluating PL additions including the approval process under D&F authority.  | 9/30/2022                           | Open              | PMO                                | CAP in place                         |
| 60   | Audit of<br>Procurement List<br>Additions Process | PMO-2021-13              | Complete in a timely manner the implementation to update the middleware software to facilitate the upgrades of the outdated vendor software and implement system patches or security updates as warranted.   | 6/26/2021                           | Open              | PMO                                | Implemented                          |
| 61   | Audit of Procurement List Additions Process       | PMO-2021-14              | Update the Commission's contingency plan to include an offsite or alternative recovery location for PLIMS in the event of a natural disaster or catastrophic incident.   | 6/30/2022                           | Open              | PMO                                | CAP in place                         |
| 62   | Audit of Procurement List Additions Process       | PMO-2021-15              | Review existing enhancements to PLIMS and determine any other enhancements needed to improve the PL additions process. The review should include documenting these processes, prioritizing enhancements, and establishing a timeline for implementation. | 9/30/2022                           | Open              | PMO                                | CAP in place                         |
| 63   | Audit of<br>Procurement List<br>Additions Process | PMO-2021-16              | Review the process for extracting and tabulating data to assess the CNAs' performance including new PLIMS data fields and standard reports. The review should include documenting these processes, prioritizing  | 9/30/2022                           | Open              | PMO                                | CAP in place                         |

| Seq. | Report Short<br>Name                        | Recommendation<br>Number | Recommendation   | Target Completion Date (Per Agency) | Current<br>Status | Responsible<br>Office <sup>1</sup> | Recommendation Progress (Per Agency) |
|------|---|--------------------------|--|-------------------------------------|-------------------|------------------------------------|--------------------------------------|
|      |   |                          | enhancements, and establishing a timeline for implementation.  |                                     |                   |                                    |                                      |
| 64   | Audit of Procurement List Additions Process | PMO-2021-17              | Evaluate the security and functionality of PLIMS after enhancements are completed and determine whether the upgraded version of PLIMS addresses the Commission's needs or should be replaced.  | 12/31/2022                          | Open              | PMO                                | CAP in place                         |
| 65   | Audit of Procurement List Additions Process | PMO-2021-18              | Establish and document a process to ensure final PLIMS data files and other calculations supporting the metrics in assessing and reporting the CNAs' performance on PL additions and other PL transactions are maintained in a centralized location; and all assumptions, adjustments, and decisions made to adjust CNA final metric ratings based on the calculated results are documented. | 9/30/2022                           | Open              | PMO                                | CAP in place                         |
| 66   | Audit of Procurement List Additions Process | PMO-2021-19              | Establish and document a process to evaluate the PLIMS information for new metrics prior to including the new metrics in the CNAs' QASPs.  | 3/31/2022                           | Open              | PMO                                | CAP in place                         |
| 67   | Audit of Procurement List Additions Process | PMO-2021-20              | Identify metrics for assessing the efficiency and effectiveness of the PL additions process and monitor progress on an annual basis. This should include tracking approval rates for PL additions separately as well as end-to-end cycle times for completing a PL addition for products and services under full Commission voting process and D&F authority.                                | 9/30/2022                           | Open              | PMO                                | CAP in place                         |

Table 2: Closed During Current Period (October 1, 2021 to December 31, 2021)

| No. | Report Short<br>Name                | Recommendation<br>Number | Recommendation   | Close Date | Current<br>Status | Responsible Office <sup>2</sup> |
|-----|-------------------------------------|--------------------------|--|------------|-------------------|---------------------------------|
| 1   | FY2020 Financial<br>Statement Audit | CFO-2020-05              | If the required statements, variance analyses, and footnotes are not submitted by the service provider on its behalf, then the Commission should consider submitting them to OMB directly.   | 11/15/2021 | Closed            | CFO                             |
| 2   | FY2020 Financial<br>Statement Audit | CFO-2020-07              | Consider preparing its own financial statements and footnotes, both at interim and year-end if the service provider cannot provide complete and accurate financial statements and footnotes timely.  | 11/15/2021 | Closed            | CFO                             |
| 3   | FY2020 Financial<br>Statement Audit | CFO-2020-13              | Ensure that new obligations are recorded only within the current FY, as required by law (Repeat finding from 2019 Financial Statement Audit).  | 11/15/2021 | Closed            | CFO                             |
| 4   | FY2020 Financial<br>Statement Audit | CFO-2020-14              | Ensure that no payment reclassifications are performed between TAS unless the payment documentation is sufficient to show that the payment was applied to another TAS in error and there are sufficient existing obligated balances in excess of the amount(s) of the payment(s) (Repeat finding from 2019 Financial Statement Audit). | 11/15/2021 | Closed            | CFO                             |
| 5   | FY2020 Financial<br>Statement Audit | CFO-2020-15              | Ensure that all obligations recorded to the general ledger are properly supported (i.e., the obligated amount recorded agrees to the obligating document) (Repeat finding from 2019 Financial Statement Audit).  | 11/15/2021 | Closed            | CFO                             |

<sup>&</sup>lt;sup>2</sup> Legend for Responsible Office is as follows:

CFO – Office of the Chief Financial Officer

CIO – Office of the Chief Information Officer

PMO – Director of the Program Management Office

| No. | Report Short<br>Name                                 | Recommendation<br>Number | Recommendation   | Close Date | Current<br>Status | Responsible Office <sup>2</sup> |
|-----|--|--------------------------|--|------------|-------------------|---------------------------------|
| 6   | FY2020 Financial<br>Statement Audit                  | CFO-2020-16              | Open and complete a review into the potential ADA violation noted and report to the appropriate parties, as necessary, so that the Commission can determine if an actual violation occurred (Repeat finding from 2019 Financial Statement Audit).  | 11/15/2021 | Closed            | CFO                             |
| 7   | FY2020 Financial<br>Statement Audit                  | CFO-2020-18              | Continue to implement the measures established in the Commission's corrective action plan relating to budgetary controls, dated September 30, 2020.  | 11/15/2021 | Closed            | CFO                             |
| 8   | FY2020 Financial<br>Statement Audit                  | CFO-2020-24              | Advise the service provider of, and request compliance with, the preparation and submission deadlines for the preparation of its financial statements and required variance analyses so that this issue can be addressed by the service provider in the future.  | 11/15/2021 | Closed            | CFO                             |
| 9   | Audit of Project Assignment and Allocation of Orders | PMO-2021-01              | Develop programmatic guidance on the interim pilot test program goals and provide it to the CNAs to help ensure the program achieves its goals, consistent with Standards for Internal Controls in the Federal Government. This includes:  a. Clarify its authority for conducting the pilot program to address recent federal court decisions that questioned whether the Commission has this authority.  b. Clarifying whether the CNAs need to update their project distribution polices to incorporate the changes for the pilot test program. | 12/31/2021 | Closed            | PMO                             |