



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

355 E Street SW (OIG Suite 335)
Washington, DC 20024-3243

June 26, 2024

MEMORANDUM

TO: Jeffrey A. Koses
Chairperson
U.S. AbilityOne Commission

Kimberly M. Zeich
Executive Director
U.S. AbilityOne Commission

FROM: Stefania Pozzi Porter *Stefania Pozzi Porter*
Inspector General
U.S. AbilityOne Commission OIG

SUBJECT: Audit of the U.S. Ability One Commission's (Commission) Data Reliability, Availability, and Accessibility

We are pleased to provide the performance audit report on the U.S. AbilityOne Data Reliability, Availability, and Accessibility conducted by RMA Associates, LLC, an independent public accounting firm. The U.S. AbilityOne Commission Office of Inspector General (OIG) engaged RMA to conduct the performance audit and provide a report. The objective of the audit was to determine if data generated to monitor and report on program growth and program employment is reliable, available, and accessible by the Commission to better inform decision-making and ensure achievement of strategic objectives.

To address the audit objective, RMA interviewed key officials from the Commission and the CNAs. RMA collected and reviewed key documents containing suitable criteria and analyzed data relevant to the audit objectives. RMA also performed the following procedures: 1) reviewed the FY 2021-2022 AbilityOne Program reports, related data to produce the reports; 2) obtained from the Commission, CNAs, and NPAs and reviewed applicable processes, procedures, and controls related to the controls around the collection, verification, accessibility, and communication of growth/employment data.

Overall, RMA concluded that the Commission did not have an adequate system, policies and procedures, and oversight for collecting, storing, and maintaining the Program related data. These

deficiencies could negatively impact the reliability and integrity of the data the Commission used for decision-making and overseeing the achievement of strategic objectives.

We appreciate the Commission's assistance during the course of the audit. If you have any questions, please contact me or Laretta Joseph, Assistant IG for Evaluation and acting Assistant IG for Audit at 571-329-3419 or at ljoseph@oig.abilityone.gov.

cc: Chai Feldblum
Vice Chairperson
U.S. AbilityOne Commission

Kelvin Wood
Chief of Staff
U.S. AbilityOne Commission



Results in Brief

Performance Audit Report of Data Reliability, Availability, and Accessibility

Office of Inspector General Report No. 2022-06. Report Date: April 22, 2024

Why We Performed This Audit

On February 10th, 2022, during a U.S. AbilityOne Commission (Commission) public meeting, there was a dialogue between Commission Members and representatives from the Central Nonprofit Agencies (CNAs) regarding program growth and program employment data. The discussion centered on who can access certain data elements necessary for decision-making.

Furthermore, during conversations with the Commission Chair and Vice Chair, the OIG learned that there were concerns regarding the lack of direct accessibility to data currently collected by the CNAs as required by the Commission. The Commission Chair and Vice Chair also raised questions as to what additional data the CNAs were currently collecting from the Nonprofit Agencies (NPAs), but not providing to the Commission. These questions particularly concerned what data the CNAs were collecting with regard to good jobs, optimal jobs, and contract performance as defined in the Strategic Plan for FY2022-2026. Finally, the Commission Chair and Vice Chair had questions regarding the capability of NPAs to provide data regarding good jobs, optimal jobs, and contract performance.

What We Audited

We reviewed the FY 2021-2022 AbilityOne Program reports, related data to produce the reports, and applicable processes, procedures, and controls within the Commission, CNAs, and NPAs.

View the full report No. 2022-06. For more information, visit us at <https://abilityone.oversight.gov>

What We Found

The Commission did not have internal policies and procedures in place that established roles and responsibilities for collecting, handling, and validating data provided by the CNAs.

We also found that the Cooperative Agreements between CNAs and the Commission lacked detailed protocols and guidelines for the validation and verification of data. We identified opportunities for improvement with the validation of data provided by the CNAs to the Commission.

In addition, we determined that the Commission does not have adequate controls to assess the quality and accuracy of the data received through reports prepared by CNAs. The Commission also lacks the oversight of whether the CNAs validated the provided data.

The Commission used the annual performance reports provided by CNAs to monitor and assess the Program and the achievement of strategic objectives. Since the agency did not have access to the data itself nor control the collection, validation, and retention of the data provided by CNAs, we determined that the lack of a unified information system owned and managed by the Commission might negatively impact the Commission's decisions and strategic planning.

Lastly, we identified opportunities for improvement with the Commission's controls related to updating website content. In our testing, we noticed that the map and the list of NPAs provided on the AbilityOne website was last updated in 2020 and did not reflect the most current information.

App. III, NPA's Available Data Fields, illustrates the type of information collected by NPAs, to which the Commission does not have access.

U.S. AbilityOne Commission

Audit of Data Reliability, Availability, and Accessibility

Final Report

Order No: 140D0421P0246/0353/21/3350

April 22, 2024

RMA Associates, LLC

4121 Wilson Blvd, Suite 1100

Arlington, VA 22203

Phone: (571) 429-6600

Fax: (703) 852-7272

www.rmafed.com

April 22, 2024

Stefania Pozzi Porter, Inspector General
Office of Inspector General
U.S. AbilityOne Commission

Dear Inspector General Porter,

RMA Associates, LLC (RMA) is pleased to submit our performance audit report on the U.S. AbilityOne Commission's (Commission) Data Reliability, Availability, and Accessibility.

The objective of the audit is to determine if data generated to monitor and report on program growth and program employment¹ is reliable, available, and accessible by the Commission to better inform decision-making and ensure achievement of strategic objectives.

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 the audit objective. We believe that the evidence obtained provides a reasonable basis for the findings and conclusions based on our audit objective.

We appreciate the opportunity to serve you and will be pleased to discuss any questions you may have.

Sincerely,

RMA Associates, LLC
Arlington VA

¹ "Program growth" and "program employment," as defined in the U.S. AbilityOne Commission Strategic Plan for FY2022-2026.

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Background

Enacted in 1938, the Wagner-O'Day Act (JWOD Act), codified in [41 U.S.C. § 8501-8506](#), established the Committee on Purchases of Blind-Made Products to provide employment opportunities for the blind. Subsequently, legislation sponsored by Senator Jacob K. Javits was signed in 1971, amending and expanding the Wagner-O'Day Act to include persons with other severe disabilities. The Act, as amended, became known as the Javits-Wagner-O'Day (JWOD) Act and the Program's name became the Javits-Wagner-O'Day Program (JWOD Program). The 1971 amendments also changed the name of the federal agency to the Committee for Purchase from People Who Are Blind or Severely Disabled to reflect the expanded capabilities of the Program.

In 2006, the Committee changed the Program's name from the JWOD Program to the AbilityOne Program, to recognize the broad positive capabilities of the program offerors. The Committee began operating as the U.S. AbilityOne Commission (Commission) and renamed the program as the AbilityOne Program.

With 15 Presidentially appointed Commission members and 32 full-time employees, the Commission is responsible for establishing the rules, regulations, and policy to ensure effective implementation of the JWOD Act and for the administration of the AbilityOne Program.

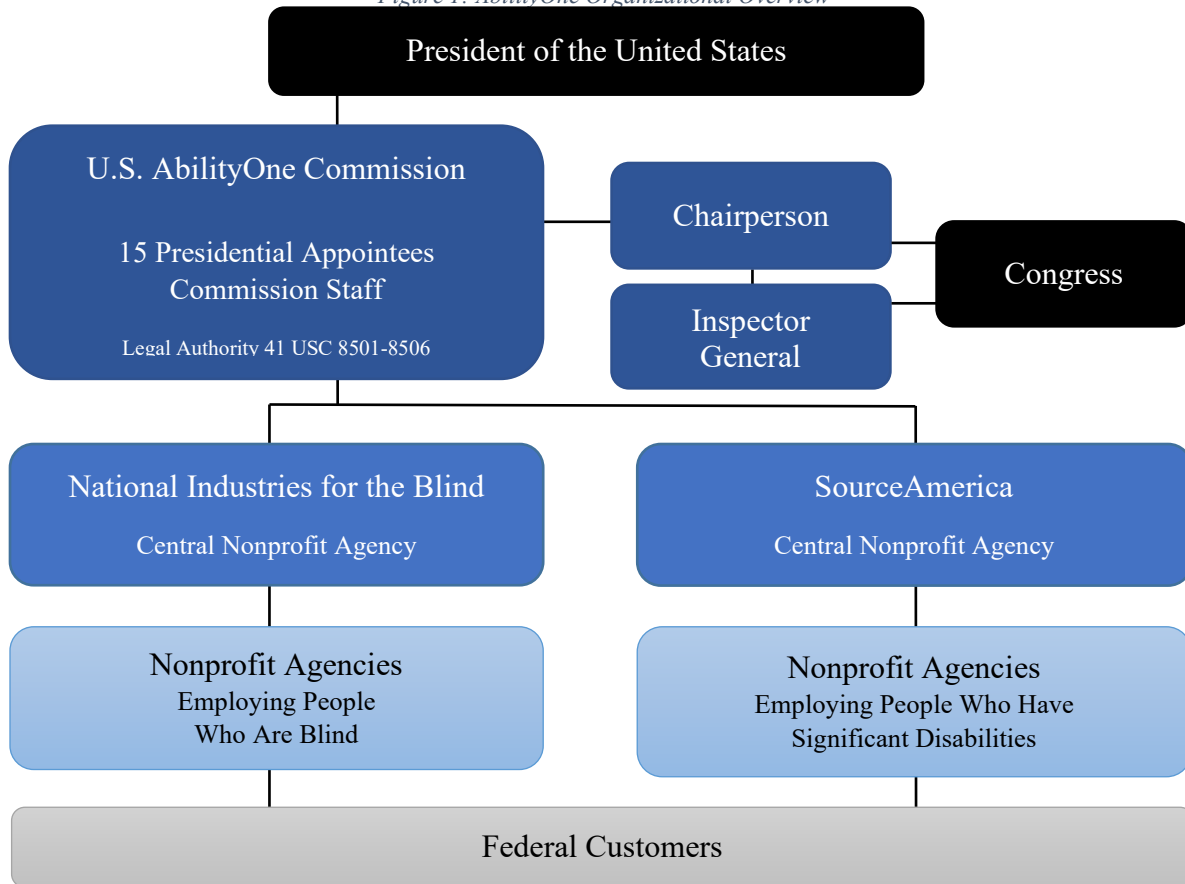
The Program is a source of employment for approximately 45,000 people who are blind or have significant disabilities through federal contracts across all fifty states and U.S. territories by approximately 500 Nonprofit Agencies (NPAs).

The AbilityOne Program provides more than \$3.6 billion in products and services to the Federal Government. The Program is administered by the Commission, assisted by two Central Nonprofit Agencies (CNAs) to facilitate the distribution of Federal Government orders for products and services, and provide other assistance to NPAs in the AbilityOne Program.

The CNAs, National Industries for the Blind (NIB) (Established in 1938) and SourceAmerica (Established in 1976), connect nonprofit agencies that hire people who are blind or have severe disabilities with federal government contract opportunities. The Commission maintains and publishes a Procurement List (PL) of specific products and services which agency purchase agents can buy to help them meet their departments' mission needs. In addition, the Commission members determine fair market price (FMP) for the PL items and, when appropriate, revise the PL to keep program products and services competitive with other commercial offerings available to agencies.

Figure 1 provided by AbilityOne, shows the organizational structure and relation flow.

Figure 1: AbilityOne Organizational Overview



On February 10th, 2022, during a Commission public meeting, there was a dialogue between Commission Members and representatives from CNAs regarding data on program growth and program employment. The dialogue centered on access to certain data elements necessary for decision-making. Furthermore, during conversations with the Commission Chair and Vice Chair, the OIG learned that there were concerns regarding the lack of direct accessibility to data currently collected by the CNAs as required by the Commission. The Commission Chair and Vice Chair also raised questions as to what additional data the CNAs were currently collecting from the Nonprofit Agencies (NPAs), but not providing to the Commission. These questions particularly concerned what data the CNAs were collecting with regard to good jobs, optimal jobs, and contract performance as defined in the Strategic Plan for FY2022-2026. Finally, the Commission Chair and Vice Chair had questions regarding the capability of NPAs to provide data regarding good jobs, optimal jobs, and contract performance.

Given the importance of data and its quality in this process, the OIG decided to initiate this discretionary performance audit based upon an assessment of program risks and engaged an independent public accountant (IPA) firm to conduct the engagement, with the OIG providing oversight as required by the IG Act of 1978, as amended.

Objectives, Scope, and Methodology

RMA Associates, LLC (RMA) conducted an independent performance audit of data reliability, availability, and accessibility to determine if data generated to monitor and report on Program growth is reliable, available, and accessible. This data is used by the Commission to better inform decision-making and ensure achievement of strategic objectives.

RMA used the following guidance in this performance audit:

- GAO Assessing Data Reliability, [GAO-20-283G](#), December 2019;
- GAO Standards for Internal Control in the Federal Government (Green Book), [GAO-14-704G](#), September 2014;
- GPRA Modernization Act Provides Opportunities to Help Address Fiscal, Performance, and Management Challenges, [GAO-11-466T](#), March 16, 2011;
- GPRA Modernization Act of 2010, [Public Law 111-352](#), January 4, 2011;
- OMB [M-19-18](#): Federal Data Strategy – A Framework for Consistency, June 4, 2019;
- OMB [M-19-15](#): Improving Implementation of the Information Quality Act, April 24, 2019;
- OMB [M-18-16](#); Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk, June 6, 2018; and
- OMB [M-13-13](#): Open Data Policy – Managing Information as an Asset, May 9, 2013.

Scope

The scope of this engagement is the FY 2021 and FY 2022 Program reports and related data used to produce the reports and their applicable processes, procedures, and controls.

Methodology

Table 1 outlines the procedures to assess the main aspects of this audit: 1) data universe, 2) roles and responsibilities, and 3) existing controls.

Table 1: RMA's Procedures Under Each Domain

Domains	RMA's Procedures
Identify the data universe and data types	<ul style="list-style-type: none"> - Examination of written policies and procedures. - Examination of the reports. - Inquiry of the data universe, sample data and available data types from: <ul style="list-style-type: none"> o Commission; o CNAs; and o NPAs.

Domains	RMA's Procedures
Roles and Responsibilities	<ul style="list-style-type: none"> - Inquiry of Commission, CNAs, and NPAs regarding roles and responsibilities. - Inquiry of Commission, CNAs, and NPAs regarding standard operating procedures. - Walkthroughs.
Controls around the collection, verification, accessibility, and communication of growth/employment data	<ul style="list-style-type: none"> - Inquiry and examination of policies, manuals, and Standard Operating Procedures (SOP) for conducting daily operations of job responsibilities related to data. - CNA process cycle walkthroughs. - NPA questionnaires. - Inspection of samples.

The data referred to in this report includes but is not limited to:

- Data collected via web-based applications, surveys, software, or any other non-digital application or enrollment system;
- Databases, data warehouses, or any digital and non-digital data repositories;
- Published, non-published, or intermediate reports prepared by CNAs, NPAs, and the Commission under the scope of this audit; and
- Publicly available data, reports, or summary-level used within the scope of this audit.

Results of the Audit

We determined that the Commission did not have an adequate system, policies and procedures, and oversight for collecting, storing, and maintaining the Program related data. These deficiencies could negatively impact the reliability and integrity of the data the Commission used for decision-making and overseeing the achievement of strategic objectives.

Finding 1: Lack of Detailed Data Validation Criteria and Oversight

The Commission shared data requirements and guidelines with CNAs through Cooperative Agreements signed by both parties. When reviewing the agreements and performing walkthroughs, RMA found that this agreement did not contain detailed protocols and guidelines for the validation and verification of data gathered and processed by the CNAs. No other supporting or supplemental information was provided to CNAs to define the data requirements.

There was a statement in the Cooperative Agreement bullet 9 on page 13, “All submissions to the Commission serve as an official certification that the CNA has validated data provided to the Commission. The CNA must perform its due diligence to ensure all information received from the NPAs, is validated prior to the CNA submitting it to the Commission PMO.”

Lack of appropriate definition of the data validation requirements allowed CNAs to define their own requirements for data validation. In direct contradiction to the Cooperative Agreement language, we found a statement from SourceAmerica in their Annual Representations and

Certifications (Reps and Certs) Report, on page 8 stating “SourceAmerica’s review is only as accurate as the data self-reported by the NPA network. Because the data is self-reported, this presents a data limitation in SourceAmerica’s ability to ensure the overall accuracy of the NPA self-reported data.” This showed that the Commission does not have appropriate oversight and control on reports received to ensure CNAs have done their due diligence in validating the data.

The Commission management relied on the cooperative agreement to establish the data requirements with the CNAs. Management also did not hold the CNAs accountable for their due diligence on data validation.

Recommendations

We recommend that the Commission’s Office of Primary Responsibility:

1. Create detailed criteria in the cooperative agreements on the data validation controls they expect the CNAs to apply.
2. Implement internal controls to oversee the reporting and data validation process.

Finding 2: Lack of Internal Policies and Procedures

We found that the Commission did not have internal Standard Operating Procedures (SOP) or policies that established roles and responsibilities and assessed the reliability, availability, and accessibility of program growth and program employment data.

Management was not able to provide sufficient evidence of a consistent process in documenting the relevant controls associated with how data was collected, evaluated, and processed. Also, the survey distributed to CNAs and NPAs demonstrated that they do not have consistent policies or procedures for collecting, processing, and handling data.

Recommendation

We recommend that the Commission’s Office of Primary Responsibility:

3. Create a standard operating procedure to collect and handle data and define roles and responsibilities for enhanced operational efficiency.

Finding 3: Lack of Oversight on the Data Published on the AbilityOne Website

We found that the map and the list of NPAs provided on the AbilityOne website were found in two different locations; updated on different dates; and inconsistent. The document found under the central nonprofit agencies was last revised in 2020, failing to incorporate the latest information. However, the document located in the non-profit agencies section was updated in January 2023.

Recommendation

We recommend the Commission's Office of Primary Responsibility:

4. Revisit/review controls related to updating website contents to ensure current and accurate information is published.

Finding 4: Lack of A Consolidated Performance Management System

The Commission used the annual performance reports provided by CNAs to monitor, assess program growth and program employment, and ensure achievement of strategic objectives. The agency did not have access to the data itself nor control the collection, validation, and retention of the data provided by CNAs.

Based on the statement RMA found in SourceAmerica's Annual Representations and Certifications (Reps and Certs) Report on page 8, "SourceAmerica's review is only as accurate as the data self-reported by the NPA network. Because the data is self-reported, this presents a data limitation in SourceAmerica's ability to ensure the overall accuracy of the NPA self-reported data."

This statement indicated that SourceAmerica, which administered the data reporting for 85% of the NPAs and was the source for most of the data issued to the Commission, did not have any control over collection, validation, and retention of the data.

The Commission management relied on CNAs and the cooperative agreement to establish the data requirements. Each CNA used its own system and NPAs used various methods to collect and maintain the data. With no unified data universe, the Commission has no visibility over the raw data used to populate the reports. The Commission did not have access to certain data elements and the completeness and accuracy of the available data was not guaranteed.

SourceAmerica and NIB specified data requirements in their contractual agreements with NPAs, mirroring requirements from the Commission. In other words, the data collected from NPAs is determined by the requirements set by the Commission. While CNAs collected additional granularity to support the information requested by the Commission (e.g., veteran-related information) from the NPAs, both SourceAmerica and NIB maintained that they were not capturing data from the NPAs beyond what is requested by the Commission.

When surveying the data collected by the NPAs, RMA determined that they collect and maintain disparate information depending on their individual needs (e.g., employment, employee performance records, disabilities, vendors, contracts). The information is not consistent nor standard across the NPAs (Appendix III: NPA's Available Data Fields).

Recommendations

We recommend that the Commission's Office of the Executive Director:

5. Research data elements needed to achieve Program objectives and revise the corresponding cooperative agreements with CNAs.
6. Develop a unified information system for use by the Commission, CNAs, and NPAs participating in the Program.

Summary and Evaluation of Management Comments

Management Comments

The Commission's Executive Director generally concurred with RMA's recommendations and stated, *"The Commission generally concurs with the auditors' findings and recommendations to establish data definitions, clearly articulate roles and responsibilities, and prescribe oversight activities as necessary to guide the validation and verification of data gathered and processed either directly or by the designated Central Nonprofit Agencies (CNAs) for use by the Commission."*

Appendix 1 includes the official management response.

Evaluation of Management Comments

We concur with management's comments and believes implementation of the recommendations will improve the Commission's oversight of CNA and NPA activities and improve the reliability, availability, and accessibility of relevant data for decision-making and strategic planning.

Appendix I: Management Comments



U.S. ABILITYONE COMMISSION

355 E STREET SW, SUITE 325
WASHINGTON, DC 20024

January 26, 2024

VIA EMAIL

MEMORANDUM FOR THE INSPECTOR GENERAL

FROM: Kimberly M. Zeich, Executive Director *Kimberly M. Zeich*
SUBJECT: Management Response to the Draft Performance Audit Report of the
Data Reliability, Availability, and Accessibility

On behalf of the U.S. AbilityOne Commission (Commission) and Chairperson Jeffrey A. Koses, thank you for the opportunity to review and comment on the findings of the Draft Performance Audit Report of Data Reliability, Availability, and Accessibility. To implement and measure performance in meeting the Commission' mission – to tap America's underutilized workforce of individuals who are blind or have significant disabilities to deliver high quality, mission-essential products and services to Federal agencies in quality employment opportunities – the data we collect, analyze, and use must be reliable, readily available, and accessible.

The audit highlighted improvements that can be made to the system(s), policies and procedures, and oversight activities related to the collection and use of AbilityOne Program data. We appreciate the auditor's attention to these important areas and independent review, resulting in the identification of gaps and opportunities to increase the Commission's operational effectiveness.

The Commission generally concurs with the auditors' findings and recommendations to establish data definitions, clearly articulate roles and responsibilities, and prescribe oversight activities as necessary to guide the validation and verification of data gathered and processed either directly or by the designated Central Nonprofit Agencies (CNAs) for use by the Commission. While the audit report links each recommendation to a specific organizational unit within the agency, the data-related responsibilities are cross-functional and may be performed by other or a broader team of employees. Accordingly, the Commission identified in its detailed response where another office of primary responsibility and/or team of personnel will be assigned implementation duties.

Importantly, the audit recommended implementing a central system for gathering and sharing programmatic data. This need is also articulated in the Commission's FY 2022-2026 Strategic Plan and is among the Commission's priorities for implementation in 2024. The Commission began meeting with the CNAs in April 2023 to discuss such a system. The Commission will prescribe the requirements for the unified system in the next generation Cooperative Agreements and will oversee establishment and operation of the system by the CNAs, with full Commission access to the data in this system.



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We understand that this audit focused on data that is currently collected, rather than on new employment data that the Commission expects to collect in the future (such as, but not limited to, indirect labor and placement program details.) Nevertheless, we found the auditors' documentation of data elements currently collected by some AbilityOne-participating nonprofit agencies – including many elements that are not required by the Commission – to be illuminating. In particular, understanding the data that some NPAs collect regarding employee performance (as reflected on page 14 of the report) is helpful and will inform the Commission in its development of data requirements going forward.

The attachment provides additional detail regarding the Commission's implementation approach. The Commission's ongoing points of contact for this response are John Konst, Director of Oversight and Compliance (703-798-6198 or jkonst@abilityone.gov), and Amy Jensen, Deputy Executive Director (703-593-9411 or ajensen@abilityone.gov).

cc: Jeffrey A. Koses, Chairperson

Attachment: Detailed Responses to Recommendations, Audit of Data Reliability, Availability, and Accessibility



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Detailed Responses to Recommendations: Audit of Data Reliability, Availability, and Accessibility:

Audit Recommendations #1 and 2: RMA recommends that the Commission's Oversight and Compliance:

1. Create detailed criteria in the cooperative agreements on the data validation controls they expect the CNAs to apply.
2. Implement internal controls to oversee the reporting and data validation process.

Commission Response: Concur, with modification to office of primary responsibility.
Target Date: December 31, 2026.

The Commission intends to establish next generation Cooperative Agreements with its designated CNAs by September 30, 2024. The Cooperative Agreements update effort involves the Commission's Agreements Officer, its Office of General Counsel, and subject matter expertise from multiple directorates, including Oversight and Compliance, Business Operations, and Strategic Communications and Government Affairs. Collectively, this team will ensure that the Cooperative Agreements include definitions for the data collected and detailed criteria for the data validation controls that the CNAs must apply. The Cooperative Agreements will articulate the Commission's process for inspecting and ensuring the CNAs' compliance with this requirement.

The Commission's Chief Risk Officer will support the development of appropriate internal controls to oversee the reporting and data validation process and will incorporate such controls into the agency's Management Internal Controls Plan by December 31, 2024. To determine whether the controls have been implemented, at least one year of data collection under the new Cooperative Agreements must take place, through the end of FY 2025. The Chief Risk Officer will test and report the effectiveness of the controls as part of the annual management assurances review no later than December 31, 2026.

Audit Recommendation #3: RMA recommends that the Commission's Oversight and Compliance:
Create a standard operating procedure [SOP] to collect and handle data and define roles and responsibilities for enhanced operational efficiency.

Commission Response: Concur, with modification to office of primary responsibility.
Target Completion Date: September 30, 2025.

The Commission will establish an SOP to guide the collection and handling of data, including definitions of programmatic roles and responsibilities and measures of effectiveness. The Commission will task a cross-functional team with implementing this recommendation, including but not limited to the Oversight and Compliance Directorate. Other Commission directorates with responsibility for data analysis and/or policy will also participate in the establishment of the SOP. A completion date of not later than September 30, 2025, will allow the Commission to consider the requirements of updated compliance policies and the updated Cooperative Agreements in issuing the SOP.



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Audit Recommendation #4: RMA recommends the Commission's Information Technology:
Revisit/review controls related to updating website contents to ensure current and accurate information is published.

Commission Response: Concur, with modification to the Office of Primary Responsibility.
Target Completion Date: September 30, 2024.

The Commission's Strategic Communications and Government Affairs (SCGA) staff has primary responsibility for updating website information, and ensures that all statutory reports are posted in accordance with deadlines specified in OMB guidance. The Commission's website data is a shared responsibility among the directorates that own the data and the Information Technology team responsible for posting or linking the information. Due to a technical error, the 2023 version of the AbilityOne map was not rendering on the website when the audit fieldwork was conducted, resulting in the finding related to this recommendation. The Commission has corrected the technical error and confirmed that its website reflects the most up-to-date map available. The list of participating nonprofit agencies posted on the Commission's website is regularly updated, currently showing data as of November 2023. In terms of continuous improvement, the Commission staff recently established a web content monitoring control to ensure that the most recent and/or current information is reflected. The Chief Risk Officer will ensure that the Management Internal Controls Program includes a periodic review and testing of this control for web content updates.

Audit Recommendations #5 and 6: RMA recommends that the Commission's Office of the Executive Director:

5. Research data elements needed to achieve Program objectives and revise the corresponding cooperative agreements with CNAs.
6. Develop a unified information system for use by the Commission, CNAs, and NPAs participating in the Program.

Commission Response: Concur, with modification.
Target Date: September 30, 2025.

The Commission's Office of Executive Director oversees a multifunctional staff team that is researching and recommending data elements necessary to measure Strategic Plan implementation and other program objectives. The Commission is updating its forms for data collection and following the process for approval of the new forms. The Commission will ensure that the next generation Cooperative Agreements include requirements for the CNAs' gathering and sharing of data. The Commission intends to establish these Cooperative Agreements by September 30, 2024.

In the next generation Cooperative Agreements, the Commission will prescribe the requirements for a central or unified data system and oversee the establishment and operation by the CNAs such that the data is fully accessible to the Commission. After the Cooperative Agreements are established, the Commission anticipates having access to an effective unified information system within one year. Accordingly, the target completion date for this recommendation is September 30, 2025.



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Appendix II: Observations from the NPA Survey

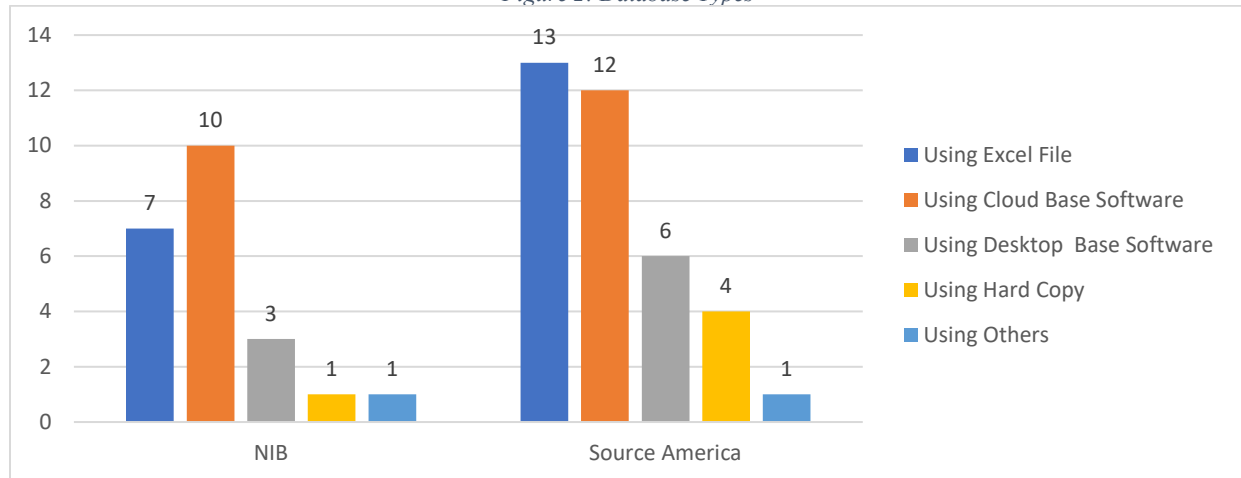
To better understand the data reliability environment, we surveyed NPAs associated with each CNA. We took a judgmental sample of the NPAs in addition to the four largest NPAs under each CNA.

CNA	Total Number of NPAs	Number of Selected Samples	Number of NPAs Participated
SourceAmerica	411	22	13
NIB	57	12	7
Total	468	34	20

Below is if summary analysis of the survey responses.

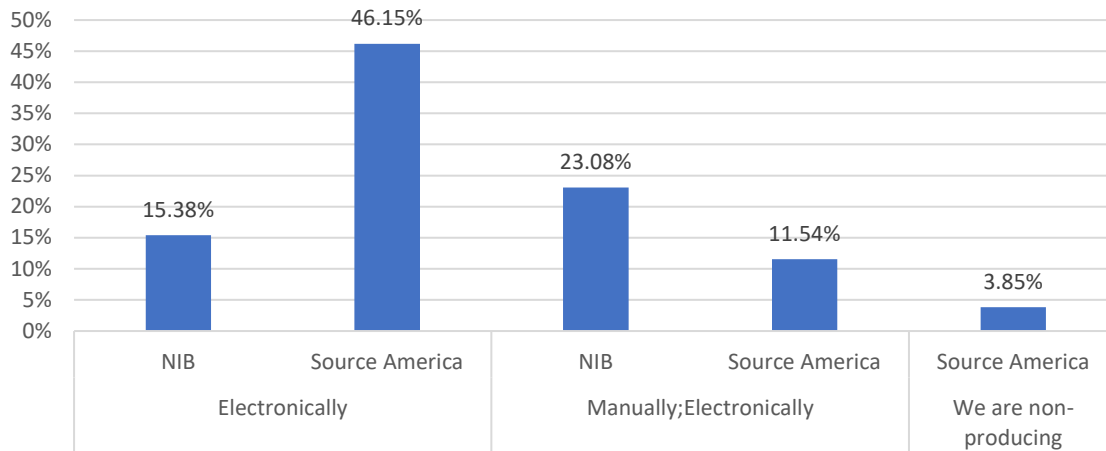
- A) Excel spreadsheets are actively used in the report preparation process (Figure 2). Hard copies and Excel spreadsheets may impact data integrity due to version control and accessibility.

Figure 2: Database Types



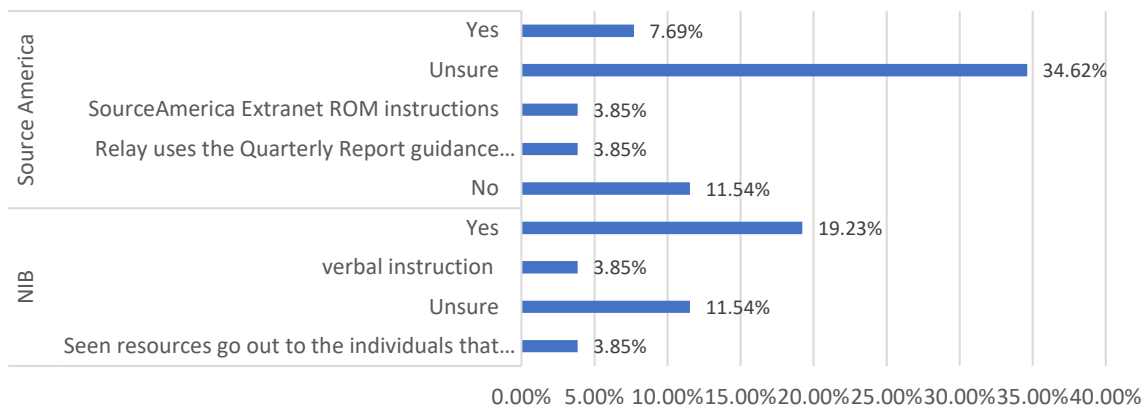
- B) While most of the data collection is electronic, approximately 35% of the participants use some manual data collection (Figure 3). Although, a manual process is not an indication of issues, it may increase the risk of errors.

Figure 3: Type of Data Collection and Maintenance Methods



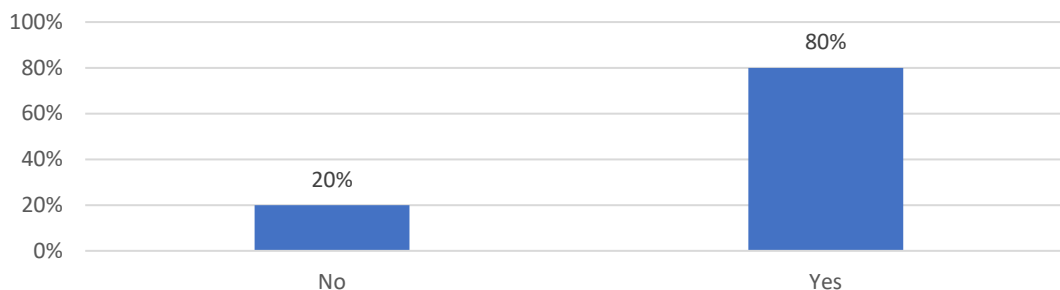
- C) More than 57% percent of the participants were unsure of the existence of specific and adequate instructions or requirements from CNAs on how to prepare/provide reports (Figure 4). The lack of oversight controls and appropriate training may lead to errors and pose a risk to data reliability.

Figure 4: Do NPAs Receive Any Specific and Adequate Instructions or Requirement from CNAs on How to Prepare/Provide Reports



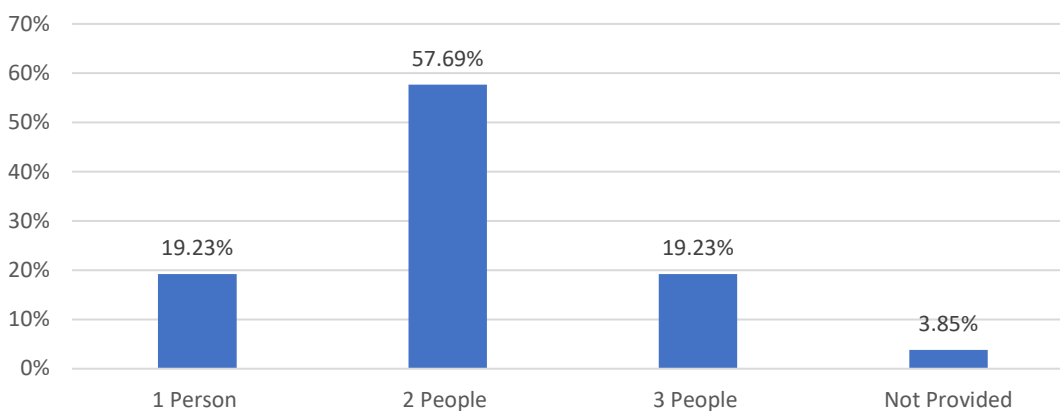
- D) 80% of the participants stated that some form of quality control process or system is in place to ensure the accuracy and completeness of reports before submission (Figure 5).

Figure 5: Existence of Quality Control Processes for Accuracy and Completeness of Reports



E) 19% of the participants stated only one person is involved in the submission of report which may lead to inadequate reviews and controls in the submission process (Figure 6).

Figure 6: Number of People Involved in Report Preparation, Review and Submission



Conclusion of Survey Results

The survey results strengthen our findings. Overall NPAs' responses show they have some levels of controls and processes in place; however, the size of the NPA and their available resources play a direct role in the quality of the process and, subsequently, the data. This shows the importance of the Commission's responsibility to define the baseline and the expectations adequately and sufficiently to set standardized requirements for the data elements required for reporting. Also, implementing a central system for gathering information and processing will improve the data quality despite the size and proficiency level of NPAs.

Appendix III: NPA's Available Data Fields

This appendix reflects the universe of data received from a sample of NPAs.² It is important to note that this data varied across NPAs and was not collected by all entities.

Recruiting

- Candidate name
- Address
- Email address
- Phone number
- Willing to relocate (Y/N)
- Candidate resume
- Work experience
- Education
- School name
- Degree level
- Major
- Minor
- Dates of study
- Licenses and certifications
- Title
- License number
- Date achieved
- Renewal date
- Skills
- Behaviors
- Motivations
- Candidate document
- References (multiple fields)
- Candidate source
- Application date
- Application history
- Disposition status
- Applicant notes
- Disposition history
- Background check
 - Request ID
 - Initiated by
 - Initiated date
 - Completion status
- Application questions
- Affirmative action demographic self IDs
 - Gender
 - Ethnic origin
 - Veteran status
 - Self-identification of disability
- Contract information
- Expiration dates

Employee Profile

- Employee number
- Name
- Company email address
- Company phone
- Personal email address
- Personal phone
- Marital status
- Address
- Employment status
- Status date
- Hire date
- Seniority date
- Contacts (beneficiary/dependent/emergency)
- Social Security Number
- Date of Birth

² This data was compiled to illustrate the type of information collected by NPAs, to which the Commission does not have access. This consolidation of data was furnished by NPAs. RMA did not audit the data for accuracy.

- Age
- Gender
- Ethnicity
- Disability status
- Veteran status
- Veteran type
- I-9 (multiple field)
- Primary language
- Secondary language
- Challenges
 - Childcare issues
 - Food insecurity
 - Language
 - Transportation
 - Unstable housing
 - Other

Employment Data

- Job Code
- Job Title
- Alternate Title
- Date in job
- Salary grade
- Pay group
- Pay frequency
- FLSA status
- Hourly/Salaried
- Full Time/Part Time
- Direct/Indirect
- Supervisor
- Work location
- Department
- Union name
- Secondary Job Title
- Salary
- Hourly rate
- Scheduled hours
- Compensation history
- Company name
- Promotion/transfer status
- Job change reason
- Job effective date
- Secondary job rate
- Secondary job effective date
- Workers' compensation code
- Scheduled shift
- Pay history-paystubs
- Direct deposit information
- Earning records
- Deductions (multiple fields)
- Benefits (multiple fields)
- PTO-plan type
- PTO-available hours
- Form 1095-C
- Offer of coverage information
- W-4
- State tax forms
- W-2
- Documents (Multiple Fields)
- Termination date
- Termination reasons
- SF86*
- SF85P*
- SF85*
- DD-Form 1172-2*
- OF 306*

*Collected but not retained

Employee Disabilities

- Diagnoses
- Functional limitations
- Supporting documents – doctor's notes/visits/progress notes
- Medication lists
- Eye medical form
- Voluntary survey to identify other disabilities

Employee Performance

- Performance reviews (multiple fields)
- Disciplinary reports
- Training/Live/On demand webinars
- Tuition reimbursement program
- Annual goals
- Professional development goal settings
- Professional development plan
- Cross training
- Continuous improvement in job accessibility
- Ability to attend outside training
- Ability to participate in NIB's Business Leadership program
- Advocates program
- Option to move up when the position is available

Work Related Injuries

- Employee information (multiple fields)
- Site location
- Date of accident
- Time of accident
- Time employee started work
- Date supervisor notified
- Was it a late report
- Location of mishap
- Supervisors name
- Was the mishap witnessed
- Supervisor telephone number
- Mishap description
- What events were leading up to the accident
- What exactly caused the mishap
- Description of the injury
- Designation of injured body part
- Did the employee seek medical attention?
- Contributing factors: (actions and conditions)
- Identified root cause
- Was the employee working within their accommodations?
- Recommendations to prevent reoccurrence
- Final plan of action
- Witness statements
- Drug test
- Photos
- Diagrams

Vendors/Clients

- Federal W-9 form
- Name/address/contact
- FEIN
- Payment preference
- Size: large or small
- Small business classification
- Banking information
- Business classification
- Contact information
- DUNS
- SSN
- TIN

Contracts

- Contract number
- Contract price
- Contract costing
- Period of performance
- Contract renewal date
- Scope
- Fully executed contracts
- Contract/customer contact information
- FTE
- Funding
- Accounts receivable
- Proposal information
- Labor rates
- Type of labor rate (SCA, CBA, DBA, Indirect)
- Holidays
- Vacation
- Sick days
- Health and welfare
- Pension contribution
- FICA
- State Unemployment Tax (SUTA)
- General liability insurance
- Workers' compensation code
- Workers' compensation rate
- Contract Line Item (CLIN)
- Productive hours
- Supplier costs
- Supplier quantities
- BLS Consumer Price Index
- List of changes
- Contract AR balance
- Unpaid invoice number
- Invoice aging
- Scheduled to pay invoices
- Notes: Explanations on past due invoices
- Credits due to the government
- Invoice responsibility
- Monthly closing balance
- Average days to collect invoice
- Days sales outstanding
- Contract current funding total
- Current funding balance
- Current contract total
- Individual CLIN funding
- Current cost reimbursable CLIN invoice totals
- Current FFP CLIN invoice totals
- Contract attachments
- Contract award
- Contract exhibits
- Contract modifications
- Contract periods of performance
- Contract signature (dates)
- Contract values
- FAR/DFARS and clauses
- Prime contract number
- Prime contract type
- Solicitations (RFP/RFQ)
- Customer address(es)
- Customer contact information
- eSRS.gov small business reporting
- FSRS.gov small business reporting
- SAM.gov annual entity registration

Subcontracts

- Subcontract agreements
- Subcontract description
- Subcontract modifications
- Subcontract number
- Subcontract period of performance
- Subcontract signature (dates)
- Subcontract type
- Subcontract value