



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR



INDEPENDENT INSPECTOR GENERAL'S REPORT

DATA Act Readiness Review of Interior Business Center
for the U.S. Department of the Interior



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INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

DEC 15 2016

Memorandum

To: Olivia Ferriter
Deputy Assistant Secretary, Budget, Finance, Performance, and Acquisition

From: Kimberly Elmore *Kimberly Elmore*
Assistant Inspector General for Audits, Inspections, and Evaluations

Subject: Independent Inspector General's Report-DATA Act Readiness Review for the
U.S. Department of the Interior, Interior Business Center
Report No. 2016-FIN-069-A

This memorandum transmits our review of the U.S. Department of the Interior's (DOI) Office of Interior Business Center's (IBC) efforts to implement the Data Accountability and Transparency Act of 2014 (DATA Act), specifically according to the eight steps in the "DATA Act Implementation Playbook" developed by the U.S. Department of the Treasury. IBC's management is responsible for complying with the applicable guidance in the playbook.

As of August 31, 2016, IBC was on track to implement the DATA Act requirements by the Act's May 2017 deadline.

If you have any questions regarding our review, please contact me at 202-208-5745.

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

cc: Michele Singer, Director, Interior Business Center

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Independent Inspector General's Report

We have reviewed the U.S. Department of the Interior's (DOI) Interior Business Center's (IBC) efforts as of August 31, 2016, to determine whether it was on track to implement the eight-step U.S. Department of the Treasury (Treasury) "DATA Act Implementation Playbook" on behalf of its customers. IBC's management is responsible for complying with the applicable guidance.

We conducted our review in accordance with attestation standards established by the U.S. Government Accountability Office (GAO) and the American Institute of Certified Public Accountants. Those standards require that we plan and perform the review to obtain limited assurance about whether any material changes should be made to IBC's implementation efforts in order to align with the DATA Act requirements. A review is substantially less in scope than an examination, the objective of which is to express an opinion on management's assertions. Accordingly, we do not express such an opinion in our review. We believe that our review provides a reasonable basis for our conclusions.

Results in Brief

The Digital Accountability and Transparency Act of 2014 (DATA Act) was passed to make Federal spending data more accessible, searchable, and reliable. The DATA Act requires Federal agencies to report financial data in accordance with new Governmentwide data standards by May 2017. The Act also requires Federal agencies to make those data available on a public website, www.usaspending.gov.

In this DATA Act “readiness review,” we reviewed the status of the U.S. Department of the Interior’s (DOI) Interior Business Center’s (IBC) efforts to implement the DATA Act according to the eight steps in the “DATA Act Implementation Playbook” on behalf of its customers. IBC management is responsible for complying with the applicable guidance in the playbook.

As of August 31, 2016, IBC was on track to implement the DATA Act requirements by May 2017 if vendor fixes to their Oracle Federal Financial System are released on time.

Since the primary purpose of this report is for use by Congress, U.S. Department of the Treasury, and Office of Management and Budget, we did not include recommendations.

Introduction

Objective

Our objective for this review was to determine whether, as of August 31, 2016, the U.S. Department of the Interior (DOI), Interior Business Center (IBC) was on track to implement the Data Accountability and Transparency Act of 2014 (DATA Act) by the Act's May 2017 deadline on behalf of its customers.

See Appendix 1 for our scope and methodology.

Background

The DATA Act was passed to make Federal spending data more accessible, searchable, and reliable. The DATA Act requires the Office of Management and Budget (OMB) and the U.S. Department of the Treasury (Treasury) to establish Governmentwide data standards and requires Federal agencies to begin reporting financial and payment data in accordance with these standards by May 2017.

The data standards define the data elements and formats required for reporting data from both agency financial systems and Governmentwide procurement systems. The data files include—

- File A, “Appropriations Account Detail”;
- File B, “Object Class and Program Activity Detail”;
- File C, “Award Financial Detail”;
- File D1, “Award and Awardee Attributes (Procurement)”;
- File D2, “Award and Awardee Attributes (Financial Assistance)”;
- File E, “Additional Awardee Attributes”; and
- File F, “Subaward Attributes.”

Agency senior accountable officials (SAOs) are required to document their assurance of internal controls over data reliability and accuracy upon submission. The data reported will be displayed on a public website, www.usaspending.gov, to help increase transparency in Federal spending by linking grant, contract, loan, and other financial data to program results.

Eight-Step Plan in the “DATA Act Implementation Playbook”

In order for agencies to accomplish this reporting objective, Treasury developed the “DATA Act Implementation Playbook” with an eight-step plan. We outline the steps and include the projected due dates indicated by the Treasury IG for each step (see Figure 1). IBC’s management is responsible for complying with the applicable guidance (see Appendix 2).

Step and Description	Due Date
1. Organize Team. Create an agency DATA Act working group and identify an SAO.	By spring 2015
2. Review Elements. Review list of DATA Act elements and participate in data definition standardization.	By spring 2015
3. Inventory Data. Perform inventory of agency data and associated business processes.	February 2015 – September 2015
4. Design and Strategize. Plan necessary changes to systems and business processes to capture and link multilevel data. Prepare cost estimates for FY2017 budget projections.	March 2015 – September 2015
5. Implement a “Broker” for Data for Submission. The broker is a software layer that takes in agency data, validates the data against the DATA Act Schema, and allows agencies to submit their data for publication.	October 2015 – February 2016
6. Test Broker Implementation. Test broker outputs to ensure that data are valid.	October 2015 – February 2016
7. Update Systems. Implement any changes needed as a result of previous steps (e.g., establish linkages between program and financial data, capture any new data).	October 2015 – February 2017
8. Submit Data. Update and refine process (repeat Steps 5–7 as needed).	March 2016 – May 9, 2017

Figure 1. “DATA Act Implementation Playbook”: Eight-step approach. Sources: “DATA Act Readiness Review Guide 2.0” (June 2, 2016) and “DATA Act Implementation Playbook 2.0” (August 24, 2016).

Inspector General Oversight Reports

The DATA Act requires a series of oversight reports by agency Inspectors General (IGs), including an assessment of the completeness, timeliness, quality, and accuracy of data submitted. The first set of IG reports was due to Congress in November 2016; however, agencies are not required to submit spending data in compliance with the Act until May 2017. As a result, the IGs will not be able to report on the spending data submitted under the Act until after that submission.

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) identified this timing anomaly in the oversight requirements and determined that the best course of action was to delay the IG reports by 1 year. The group issued a letter to the Senate Committee on Homeland Security and Government Affairs

and the House Committee on Oversight and Government Reform establishing the strategy (see Appendix 3).

As a result, the IGs plan to provide Congress with their first required reports in November 2017, a 1-year delay from the statutory due date, with subsequent reports following on a 2-year cycle. Although CIGIE suggested delaying the initial report, it encouraged IGs to undertake DATA Act readiness reviews, such as this one, at their respective agencies well in advance of the first November 2017 report.

Results of Review

We reviewed IBC's efforts as of August 31, 2016, to implement the eight-step "DATA Act Implementation Playbook" on behalf of its customers. Based on the results of the review, IBC is on track to meet the Act's May 2017 data reporting deadline.

Below we discuss IBC's status for each of the eight steps as of August 31, 2016, and provide information on events and facts learned subsequent to that date.

Step 1: Organize Team

DOI's central accounting system, the Financial Business Management System (FBMS), manages financial and business functions across all bureaus and houses key data needed for DATA Act reporting. In 2015, DOI formed its DATA Act working group through the FBMS executive governance structure. The group comprised representatives from each major reporting component except for Interior's Federal Shared Service Provider, IBC; however, we did identify open lines of communication and participation by IBC in the DATA Act implementation efforts with the DOI DATA Act working group.

We also identified that IBC created its own working group with members from its Oracle Shared Services and financial management branches to return data to their external clients who wish to report themselves and for those who want IBC to report on their behalf. Though IBC does not have its own governance structure to report its DATA Act requirements to its external customers, it has communicated DATA Act requirements, what services it will provide, and its status of DATA Act efforts to them. IBC has communicated with external customers through bulletins, email notifications, monthly user meetings with customers, and an "Oracle Customer's Day" held on May 11, 2016. IBC provides services for its internal customers through FBMS and communicates to them through the existing FBMS governance structure for the DATA Act requirements.

The DOI working group has designated the Principal Deputy Assistant Secretary for Policy, Management, and Budget as SAO for the agency's DATA Act implementation efforts. We inquired whether IBC was using the DOI SAO and found that IBC was not and that it did not have its own SAO.

Step 2: Review Elements

The IBC working group reviewed OMB Memorandum M-15-12, "Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable," and the DATA Act elements and definitions to ensure understanding of each element and its relation to customers' business operations. IBC also participated in meetings with Oracle, OMB, and Treasury for the reporting submission specification and DATA Act Information Model Schema

(the model for organization and exchange of data). We found that IBC completed its review and mapping of the elements.

During our review of this step, we were unable to obtain documentation of meetings with the DOI SAO, other than status emails to the IBC Financial Management Director.

Step 3: Inventory Data

IBC completed its data inventory. Using guidance from Treasury, IBC created an inventory list for its customers to identify standardized elements. It then analyzed where and how these elements were being used and identified gaps. IBC addressed these gaps using a series of methods to include configuration changes, policy changes, and vendor updates.

We identified that IBC uses FBMS to perform functions for its internal customers (DOI) and that internal customers will adhere to the DATA Act reporting requirements through FBMS. IBC uses Oracle Federal Financial System to perform financial functions for its external customers. IBC identified gaps in its Oracle Federal Financial System related to the DATA Act requirements and approached Oracle to resolve gaps. Oracle indicated that it would provide patches to the Oracle Federal Financial System to resolve the gaps for IBC's Federal customers. The patches are required to enable non-DOI customers to have IBC perform its Government Treasury Account Symbol Adjusted Trial Balance System (GTAS) reporting services for the DATA Act initiative. The GTAS replaces the functionality of numerous other trial balance reporting systems as the primary means of reporting agency trial balance data to the U.S. Treasury. The rest of IBC's external customers will be responsible for reporting their own information to comply with the DATA Act.

IBC did not identify an alternate solution if Oracle was unable to provide fixes to its Federal Financial System in time to meet the May 2017 DATA Act submission deadline.

Step 4: Design and Strategize

The IBC Oracle working group developed and submitted to OMB a DATA Act implementation plan in September 2015, followed by a revised plan in August 2016 that will fulfill its reporting requirements under the DATA Act if Oracle releases updates on time.

IBC should have completed this step by September 2015 (see Figure 1 on page 4), but was still in process as of August 31, 2016, because, according to a U.S. Government Accountability Office (GAO) report, needed guidance was not provided in time for agencies to make progress on certain steps.¹ Specifically,

¹ GAO Report No. GAO-16-556T, "DATA Act: Progress Made but Significant Challenges Must Be Addressed to Ensure Full and Effective Implementation," Apr 19, 2016.

agencies needed guidance on how some data elements should be reported so they are consistent and comparable. For example, “Award Description” (“a brief description of the purpose of the award”) was interpreted differently by agencies.

During our review, IBC stated it did not receive any funding for implementing the DATA Act requirements and that IBC support is provided as part of the operations and maintenance, which is funded by IBC’s customers’ inter-agency agreements. We reviewed the DATA Act Implementation Plan for Oracle Federal Financials, dated September 14, 2015, and the updated DATA Act Implementation Plan, dated August 12, 2016. Both indicated that there are five challenges to meeting the May 2017 deadline, with funding being listed as number 1.

Step 5: Implement a “Broker” for Data Submission

The IBC working group plans to use the broker developed by Treasury. We were unable to perform all review steps for Step 5 because the working group’s efforts were still in process. IBC required five patches in its Oracle Federal Financial System to comply with DATA Act requirements. The first patch is for the Award ID, the second, third, and fourth contain configuration updates, and the fifth is for file A/B/C data extracts. The fifth patch is estimated to be released by January 2017. Once Oracle receives, tests, and installs all five patches, IBC will move forward to establish connectivity to the broker.

Per Figure 1 on page 4, IBC should have completed this step by February 2016; however, according to a GAO report dated April 29, 2016, Schema version 1.0 was released 4 months later than originally planned.² Schema Version 1.0 provides technical guidance for Federal agencies about what data to report to Treasury, including the authoritative sources of the data elements and the submission format. This caused Oracle to delay development of the key software patches that IBC needs to facilitate agency data submissions from their existing financial management systems. The patches are planned to be released no later than January 2017.

Step 6: Test Broker Implementation

The IBC working group has not started Step 6 of the DATA Act implementation plan, so no data exist to validate.

Step 7: Update Systems

The IBC working group has not started Step 7 of the DATA Act implementation plan, so we could not determine whether other system changes are needed.

² GAO Report No. GAO-16-824R, “DATA Act: Initial Observations on Technical Implementation,” Aug 3, 2016.

Step 8: Submit Data

The IBC working group has not started Step 8 of the DATA Act implementation plan, so we could not determine whether the process needs refinement or updates.

Events Subsequent to Fieldwork

On September 27, 2016, DOI SAO duties for the DATA Act implementation requirements were delegated to the Deputy Assistant Secretary for Budget, Finance, Performance, and Acquisition.

On September 30, 2016, we identified that IBC will report GTAS adjusted trial balance financial information for eight external customers. Per OMB Memorandum M-15-12, OMB and Treasury will fulfill a portion of the DATA Act requirements using existing agency reporting through the GTAS System and that agencies will continue to submit agency-level financial data to OMB and Treasury using this system.³ None of these external customers for whom they will report DATA Act requirements are Chief Financial Officer agencies.

On November 22, 2016, IBC provided an update on Oracle's release of the five Data Act patches. IBC indicated that in September 2016, Oracle released the first patch and implemented it into IBC's Oracle Federal Financials system. The second, third, and fourth patches were released by Oracle in October 2016 and were implemented into their Oracle Federal Financials system. IBC told us that the fifth patch to accommodate creation of Files A, B, and C is now scheduled to be released sometime in December of 2016.

³ OMB Memorandum M-15-12, "Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable," May 8, 2015.

Conclusion

Based on our review, IBC is on track to implement the DATA Act requirements by the May 2017 deadline if vendor updates to Oracle Federal Financials are released on time.

Also, except for what is noted in events subsequent to fieldwork, nothing came to our attention that caused us to believe that IBC's current progress is not an accurate reflection as of August 31, 2016, to implement the DATA Act requirements in the eight-step "DATA Act Implementation Playbook."

IBC Comments

During our exit conference held November 17, 2016, IBC generally agreed with our report. IBC confirmed that they participate within DOI's FBMS executive governance structure and now meet and document meetings with the new DOI SAO. IBC expressed its concern that limited financial resources would not enable it to identify an alternate solution if Oracle was unable to provide fixes to its Federal Financial System.

Appendix I: Scope and Methodology

Scope

This review covered the U.S. Department of the Interior’s (DOI) Interior Business Center’s (IBC) implementation plan for the Digital Accountability and Transparency Act of 2014 (DATA Act), which aligns with the eight steps in the “DATA Act Implementation Playbook” issued by the U.S. Department of the Treasury.

We conducted our fieldwork at the Denver Federal Center in Lakewood, CO, and DOI headquarters in Washington, DC.

Methodology

We interviewed the IBC DATA Act working group, reviewed documentation provided by the working group, compared computer generated information to source documents, compared IBC’s implementation plan to the Treasury-issued playbook and other guidance, and reviewed IBC’s project plan.

We conducted our review in accordance with attestation standards established by the U.S. Government Accountability Office (GAO) and the American Institute of Certified Public Accountants. Those standards require that we plan and perform the review to obtain limited assurance about whether any material changes should be made to IBC’s implementation efforts in order to align with the DATA Act requirements. A review is substantially less in scope than an examination, the objective of which is to express an opinion on management’s assertions. Accordingly, we do not express such an opinion in our review. We believe that our review provides a reasonable basis for our conclusions.

Criteria and Best Practices

- Digital Accountability and Transparency Act of 2014, May 9, 2014.
- “DATA Act Implementation Playbook,” Version 1.0, June 2015.
- OMB Memorandum M-15-12, “Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable,” May 8, 2015.
- OMB Management Procedures Memorandum No. 2016-03, “Additional Guidance for DATA Act Implementation: Implementing Data Centric Approach for Reporting Federal Spending Information,” May 3, 2016.
- GAO “Schedule Assessment Guide, Best Practices for Project Schedules,” Report No. GAO-16-89G, December 2015.

Suggested Actions

- IBC should use the DOI SAO as its SAO.

- IBC should meet with the DOI SAO and document those meetings.
- IBC should identify an alternate solution if Oracle is unable to release their final patch on time.

Appendix 2: Management Representation Letter

Written responsibilities, representations, and assertions by IBC management on their DATA Act responsibilities follow on page 14.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

November 29, 2016

Ms. Kimberly Elmore
Assistant Inspector General for Audits, Inspections, and Evaluations
Office of the Inspector General
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Ms. Elmore,

This letter is in connection with your readiness review of the Department of the Interior, Interior Business Center's (DOI-IBC's) Digital Accountability and Transparency Act of 2014 (DATA Act: Pub. L. 113-101) and OMB Memorandum M-15-12.

You conducted your readiness review to provide assurance that nothing came to the attention of the Office of Inspector General which would cause you to believe that Interior Federal Shared Service Provider is not on track to implement the requirements of the Data Accountability and Transparency Act of 2014 (DATA Act) on behalf of its customers by the Act's May 2017 submission deadline.

We understand and acknowledge that IBC's management is responsible for the fair presentation of the information included within the submission of the DATA Act in accordance with applicable requirements. We are responsible for making all related information available to you to conduct your readiness review. Further, we agree to communicate to you the discovery of any material misstatements which could affect the fair presentation of the DATA Act submission. The readiness review does not relieve us of the aforementioned responsibilities.

We confirm, to the best of our knowledge and belief, the following representations and assertions made to you during the readiness review. These representations pertain to IBC's May 2017 DATA Act submission.

Representations in accordance with Laws and Regulations

1. We are responsible for IBC's compliance with all applicable laws and regulations
2. We have identified and disclosed to you all laws, regulations, and related financial records that have a direct and material effect on the determination of amounts reported within the submission of the DATA Act.
3. There are no:
 - a. violations or possible violations of laws or regulations whose effects we should evaluate for disclosure in the DATA Act submission of May 2017, or
 - b. un-asserted claims or assessments that are probable of assertion and must be disclosed that have not been disclosed.

4. We are not aware of any violations of the DATA Act; Pub. L. 113-101 or OMB M-15-12 that we must report to the Congress and the President (and provide a copy of the report to the Comptroller General) in our DATA Act submission (or, we have reported all known violations of the DATA Act; Pub. L. 113-101 or OMB M-15-12) and through the date of this letter.

Assertions in accordance with DATA Act Regulations

1. IBC has completed or is on track to complete steps 1-5 from the DATA Act Playbook. Steps 1-4 have been completed, while step 5 is in progress.
 - a. A DATA Act work group has been established and includes the impacted communities within IBC.
 - b. IBC has reviewed the list of DATA Act elements and participated in data definitions standardization. IBC has performed an inventory of agency data and associated business process systems.
 - c. IBC will be using the Treasury Broker.
2. Challenges related to IBC's implementation of the DATA Act consist of:
 - a. IBC has not received any funding from the Department of the Interior or from our external customers to fund the implementation of the DATA Act requirements for Oracle Federal Financials (OFF).
 - b. IBC is dependent upon Oracle to provide all updates to the OFF software to enable our customers to report under the DATA Act requirements.
 - c. The first patch for Award ID, released by Oracle, worked for other Federal Agencies but not for IBC as it was not compatible with the Oracle version we host. Oracle was not aware that the Contract Lifecycle Management (CLM) module was implemented on Oracle version 12.1. Oracle is working on the issues for this patch and we continue to work with Oracle on future patches as well.

IBC executive leadership is aware of the challenges IBC currently faces.

Sincerely,



Donna L. Edsall, CPA
Associate Director
Financial Management Directorate
Interior Business Center

Appendix 3: CIGIE's DATA Act Anomaly Letter

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) identified a timing anomaly with the oversight requirements contained in the DATA Act. The letter of explanation submitted by CIGIE to the Senate Committee on Homeland Security and Government Affairs and the House Committee on Oversight and Government Reform follows on page 17.



Council of the
INSPECTORS GENERAL
on INTEGRITY and EFFICIENCY

December 22, 2015

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

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

Dear Mr. Chairmen and Ranking Members:

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

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

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

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

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

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

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

Sincerely,



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

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

