



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



INDEPENDENT INSPECTOR GENERAL'S REPORT

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



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

NOV 30 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
Report No. 2016-FIN-069

This memorandum transmits our review of the U.S. Department of the Interior's (DOI) 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. DOI management is responsible for taking steps to comply with the applicable guidance in the playbook.

As of August 31, 2016, DOI was not on track to implement the DATA Act requirements by the Act's May 2017 deadlines.

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: Martin Quinlan, Director, Business Integration Office

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Independent Inspector General's Report

We have reviewed the U.S. Department of the Interior's (DOI) 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." DOI 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 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 DOI'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 review the status of the U.S. Department of the Interior’s (DOI) efforts to implement the DATA Act according to the eight steps in the “DATA Act Implementation Playbook.” DOI management is responsible for complying with the applicable guidance in the playbook.

As of August 31, 2016, DOI was not on track to implement the DATA Act requirements by the Act’s May 2017 deadline. We found that DOI is relying on a software upgrade that will not be completed on time due to vendor delays and is 6 months behind on the timeframes recommended in the playbook.

Since the primary purpose of this report is for use by Congress, the U.S. Department of the Treasury, and the 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) was on track to implement the Data Accountability and Transparency Act of 2014 (DATA Act) requirements in the eight-step “DATA Act Implementation Playbook” by the Act’s May 2017 deadline.

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 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 included the projected due dates indicated by the Treasury IG for each step (see Figure 1). DOI’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.	March 2015 – September 2015
5. Implement a “Broker” for Data 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 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 agencies well in advance of the first November 2017 report.

Results of Review

We reviewed DOI efforts as of August 31, 2016, to implement the eight-step “DATA Act Implementation Playbook.” Based on our review, we determined that DOI is not on track to meet the Act’s May 2017 data reporting deadline.

Below we discuss DOI 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. It designated the Principal Deputy Assistant Secretary for Policy, Management and Budget as the SAO, responsible for overseeing DOI’s implementation of the DATA Act and managing the project across multiple DOI bureaus and Federal spending communities.

The FBMS executive governance structure—and thus the DATA ACT working group—includes representatives from each major reporting component except for the Interior Business Center (IBC), Office of Natural Resources Revenue (ONRR), and Office of Trust Funds Management (OTFM).

We identified that IBC does not have a governance structure for the DATA Act, yet uses FBMS for its internal customers. ONRR and OTFM are required to report DATA Act Files A (“Appropriations Account Detail”) and B (“Object Class and Program Activity Detail”), but are not represented in the FBMS executive governance structure.

Step 2: Review Elements

The working group reviewed OMB Memorandum M-15-12, “Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable,” and participated in the data element standardization process with Treasury and OMB. During this process, 57 DATA Act data elements were identified. Treasury and OMB requested that all agencies, including DOI, review and provide feedback on these data elements. We found that DOI’s working group reviewed the data elements and provided a response to Treasury and OMB.

During our review of this step we were unable to obtain documentation of meetings with the SAO, other than oral and written statements that the SAO was routinely updated on progress. Documenting meetings can provide a trail that meetings happened and indicate ownership of major decisions made.

Step 3: Inventory Data

The working group traced how DATA Act elements are used across business processes, systems, and applications by working with the bureaus and financial reporting system owners and by reviewing consolidated financial statements. Using guidance from Treasury, the working group determined how the data elements related to each other and the source systems in which they were stored, and brainstormed ways to improve business systems to extract the data required for reporting.

We found that DOI is on track to produce Files A and B, but not Files C and D2, due to challenges with formatting the requirements into FBMS. To report File C, DOI will use standard SAP (business/accounting software) functionality. A new field is needed in FBMS in order to use SAP's software updates. DOI's original plan was to implement this new field as part of the new procurement instrument identifier (PIID) that is required by the Federal Acquisition Regulation in contractual documents by October 2017. SAP was responsible for developing the software updates required for the PIID, and DOI has installed these updates. During initial testing, DOI found a significant problem in that data were not being extracted in compliance with the DATA Act requirements. DOI's Business Integration Office (BIO) worked with SAP to examine the problem, has received updates, and is now retesting the data extract. If DOI is unable to use this field without adversely affecting the end-users, it will not be able to move forward with this approach. DOI is unable at this point to commit to submitting File C before November 2017, as stated in its implementation plan, but continues to search for alternative solutions.

To create File D2, DOI needs to update its acquisition and grants management system, called the Procurement Information System for Management (PRISM), from version 7.2 to version 7.3. Treasury is scheduled to decommission its Federal Assistance Awards Data System PLUS (FAADS+) file format in January 2017, after which agencies will be required to use File D2 to report award and awardee attributes for financial assistance. BIO told us that the current version of PRISM does not meet all the requirements of the DATA Act. Because many Federal agencies in the acquisition community use PRISM, the vendor, Compusearch, agreed to implement the full DATA Act File D2 requirements into its version 7.3 upgrade, which was scheduled for release at the end of 2016.

Recognizing this delay, DOI attempted to create an alternate plan to submit File D2 by manually formatting the FAADS+ file into D2 format in August 2016. When DOI submitted its test File D2 to the award submission portal, however, it was rejected for numerous errors, including ZIP +4 errors in vendor records in the General Services Administration's centralized system for Federal acquisition and award data, the system for award management. BIO told us that Treasury is currently researching alternatives for the ZIP+4 errors.

Step 4: Design and Strategize

The working group developed and submitted a DATA Act implementation plan to OMB in September 2015, followed by a revised plan in August 2016. The plan enables DOI to fulfill its reporting requirements under the DATA Act, but not by the May 2017 due date. As of August 31, 2016, DOI's implementation plan was to make its first DATA Act submission to Treasury in November 2017.

Per Figure 1, DOI should have completed this step by September 2015; however, 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, agencies needed guidance on how some data elements should be reported in order to produce consistent and comparable data. For example, the definition of data element "Award Description" ("a brief description of the purpose of the award") was interpreted differently by agencies. Further, the DOI working group told us that it will not meet the May 2017 deadline and indicated such in its updated implementation plan.

During our review, the working group stated that it did not receive any funding for implementing the DATA Act requirements. We confirmed that DOI requested \$10,453,000 for DATA Act implementation in the FY 2016 budget, but received nothing. DOI then requested \$10,200,000 in the FY 2017 budget and, as of August 31, 2016, had still received nothing.

We also noted that the working group did not have well-documented progress records to track progress of DOI's DATA Act implementation schedule.² Progress records are the documentation trail between actual experience on the activity and the progress recorded on the schedule.

Step 5: Implement a "Broker" for Data Submission

The working group plans to use the broker developed by Treasury. We were unable to perform review steps for Step 5 because the working group began working on this step on August 26, 2016, 5 days before we concluded our review. DOI requires certain SAP updates for FBMS and an upgrade to PRISM (as discussed previously) to establish connectivity to the broker and prepare the data for submission to the broker.

Per Figure 1, DOI should have completed this step by February 2016. According to a GAO report, however, on April 29, 2016, Treasury released version 1.0 of the DATA Act schema (the model for organization and exchange of data) 4 months

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

² Per GAO's "Schedule Assessment Guide: Best Practices for Project Schedules" (Report No. GAO-16-89G, December 2015), specifically "Best Practice 9: Updating the Schedule Using Actual Process and Logic," schedules should be checked on a regular basis via progress records.

later than originally planned.³ 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. DOI's working group and GAO indicated that certain software vendors said they waited to start developing key software updates until a stable version of the schema was released.⁴ BIO told us that DOI needs updates to SAP and an upgrade to PRISM, which are planned for release no later than February 2017, to facilitate agency data submissions from its existing financial management systems.

Step 6: Test Broker Implementation

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

Step 7: Update Systems

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

Step 8: Submit Data

The 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 26, 2016, Compusearch informed DOI that the PRISM version 7.3 upgrade will not be released until March 2017. On September 27, 2016, SAO duties for DATA Act implementation were delegated to the Deputy Assistant Secretary for Budget, Finance, Performance, and Acquisition.

After a meeting with Treasury and OMB in October 2016, DOI reviewed alternate plans to resolve the File C extraction issues and the delay of the PRISM version 7.3 upgrade fix for File D2. The working group devised and submitted an alternate plan to OMB on November 4, 2016, detailing potential workarounds for these two files to meet requirements for the May 2017 data submission deadline. BIO told us that the workaround for File C may have an adverse impact on FBMS end users and, as a result, DOI cannot commit to that workaround before appropriate testing of the effect on end users. BIO also told us that the workaround for File D2 would affect thousands of FBMS users, who would require training on the workaround and then retraining after the PRISM version 7.3 upgrade has been released. Further, the File D2 workaround would require a Compusearch "hotfix" to DOI's current PRISM version 7.2. As a result, DOI cannot commit to submitting File D2 before the upgrade to PRISM; however, BIO said that it is currently testing and reviewing alternate solutions for

³ GAO Report No. GAO-15-290, "DATA Act: Initial Observations on Technical Implementation," August 3, 2016.

⁴ GAO-16-824R, DATA Act Technical Implementation Update, "DATA Act: Initial Observations on Technical Implementation," August 3, 2016.

both files that limit unreasonable expenditures and operational burden to the agency.

The current SAO expressed concern over documenting assurance of data reliability and accuracy for Files C and D2 by May 2017 due to the limited amount of resources and time to appropriately test for data integrity.

Conclusion

Based on our review, DOI is not on track to implement the DATA Act requirements by the May 2017 deadline because of their reliance on vendor information system upgrades. The vendor has delayed releasing the upgrades and that has put DOI behind by 6 months.

Also, except for what is noted in events subsequent to fieldwork, nothing came to our attention that caused us to believe that DOI'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."

Agency Comments

During our exit conference held November 15, 2016, DOI generally agreed with our report. DOI confirmed that IBC is part of the FBMS executive governance structure, which manages DOI's DATA Act implementation. DOI will document IBC's participation in the FBMS executive governance structure as it pertains to DATA Act implementation and will document meetings with the SAO. DOI also committed to create more detailed progress records in order to track progress of its DATA Act implementation.

Appendix I: Scope and Methodology

Scope

This review covered the U.S. Department of the Interior’s (DOI) 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 DOI DATA Act working group, reviewed documentation provided by the working group, compared computer generated information to source documents, compared DOI’s implementation plan to the Treasury-issued playbook and other guidance, and reviewed DOI’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 DOI’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

- DOI should include IBC, ONRR, and OTFM in its FBMS executive governance structure for the DATA Act.
- The DOI DATA Act working group should document meetings with the SAO.

Appendix 2: Management Representation Letter

Written responsibilities, representations, and assertions by DOI management on their DATA Act responsibilities follows on page 15.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

NOV 29 2016

Ms. Kimberly Elmore
Assistant Inspector General for Audits, Inspections, and Evaluations
U.S. Department of the Interior Office of Inspector General
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's (DOI) Digital Accountability and Transparency Act of 2014 (DATA Act: Pub. L. 113-101) and OMB Memorandum M-15-12 to determine whether DOI is on track to implement the eight-step U.S. Department of the Treasury "DATA Act Implementation Playbook."

You conducted your readiness review to provide assurance that nothing came to the attention of the Department of the Interior, Office of Inspector General which would cause you to believe that our agency is not on track to implement the requirements of the Data Accountability and Transparency Act of 2014 (DATA Act) per the eight-step U.S. Department of the Treasury "DATA Act Implementation Playbook."

We understand and acknowledge that DOI's management is responsible for the fair presentation of the information included within the submission of files under 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 files 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 DOI's May 2017 DATA Act files submission.

Representations in accordance with laws and regulations:

1. We are responsible for DOI's compliance with all applicable laws and regulations
2. We have identified and disclosed to you all laws, regulations, and pertinent information that have a direct and material effect on the determination of amounts to be reported within the submission of files under the DATA Act.

3. 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 through the date of this letter.

Assertions in accordance with DATA Act regulations:

1. DOI has completed and 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 Senior Accountable Official (SAO) has been designated

b. DATA Act activities are coordinated through the governance structure that provides oversight for DOI's Financial and Business Management System (FBMS), which includes the impacted communities within DOI.

c. DOI has reviewed the list of DATA Act elements and participated in data definitions standardization. DOI has performed an inventory of agency data and associated business process systems.

d. DOI will be using the Treasury Broker.

2. Challenges related to DOI's implementation of the DATA Act include:

a. Vendor software updates. DOI is getting good support from SAP, but limited support from CompuSearch.

b. The Treasury Department's decision to change the Award Submission Portal format in January, 2017, instead of with the DATA Act submission in May, 2017, has created a risk to DOI's ability to report detailed financial assistance data.

c. The requirement for vendor Zip Code + 4, instead of the simple Zip Code has created a risk for agency submission of financial assistance data because the System for Award Management (SAM) does not require ZIP+4 and the vendor data is sourced from SAM.

d. The implementation schedules for the Procurement Instrument Identifier (PIID) and the DATA Act do not align, creating additional work for agencies. File C (Award/Financial) links financial and award data. The link between the two is the contract award number recorded in the Federal Procurement Data System – Next Generation (FPDS-NG). DOI does not include the full FPDS-NG contract number in FBMS. The PIID introduces a new contract award number and will be stored within FBMS. The PIID does not go into effect until October, 2017. Coordination of the go-live for these two efforts would reduce inefficiencies that could occur as a result of agencies implementing a work-around for the few months between April and October.

e. DOI requested, but did not receive any funding for implementation of the DATA Act. To manage this funding risk, DOI has aligned DATA Act activities with regularly scheduled FBMS updates.

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

Sincerely,

A handwritten signature in black ink that reads "Olivia B. Ferriter". The signature is written in a cursive style with a large initial 'O' and a long, sweeping tail on the 't'.

Olivia B. Ferriter
Deputy Assistant Secretary
Budget, Finance, Performance and Acquisition

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 19.



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

