Audit of Railroad Retirement Board's Digital Accountability and Transparency Act of 2014 Submission for First Quarter of Fiscal Year 2019

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OFFICE OF INSPECTOR GENERAL
U.S. RAILROAD RETIREMENT BOARD
Audit of RRB's DATA Act Submission for First Quarter of Fiscal Year 2019

What We Found

Our audit determined that the Railroad Retirement Board (RRB) generally submitted complete, accurate, and high quality financial and award data for its first quarter of fiscal year 2019 publication on USASpending.gov, which consisted of $4.1 billion in obligations. As of December 2018, the RRB's obligation amount was in the top 20 for the Federal Government. However, we determined improvements could be made to internal controls over the Digital Accountability and Transparency Act of 2014 (DATA Act) submission, the completeness and accuracy of the agency's File B submission, the timeliness of the Senior Accountable Official's (DATA Act) certification, and the completeness and accuracy of Files D1 and D2.

Further, we determined that the RRB generally implemented and used the governmentwide financial data standards established by the Office of Management and Budget and the Department of the Treasury, in accordance with standards. However, we did identify improvements that could be made to the reporting of financial assistance awards containing personally identifiable information and resolving gaps between authoritative data sources and RRB's actual data sources.

What We Recommend

To address the exceptions identified in this audit, we made 11 recommendations for improving the RRB's DATA Act policies and procedures, internal controls, and the overall DATA Act submission.

RRB management concurred with all of our recommendations. The Bureau of Fiscal Operations has provided target completion dates in its management comments as provided in the appendix. However, the Bureau of the Actuary and Research has not provided target completion dates in its management comments.

What We Did

The DATA Act required the Inspector General of each federal agency to review a statistically valid sample of the spending data submitted under the DATA Act; and submit to Congress and make publicly available a report assessing the completeness, timeliness, quality, and accuracy of the data sampled and the implementation and use of data standards by the federal agency.

The objectives of this audit were to assess the completeness, accuracy, timeliness, and quality of the first quarter of fiscal year 2019 financial and award data submitted by the RRB for publication on USASpending.gov; and assess the RRB's implementation and use of the governmentwide financial data standards established by the Office of Management and Budget and the Department of the Treasury.

The scope of the audit was first quarter of fiscal year 2019 data the RRB submitted for publication on USASpending.gov, and any procedures, certifications, documentation, and controls to achieve this process.

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INTRODUCTION

This report presents the results of the Office of Inspector General's (OIG) audit of the Railroad Retirement Board's (RRB) compliance with the Digital Accountability and Transparency Act of 2014 (DATA Act), as mandated.[1] The RRB reported $4.1 billion in obligations on USASpending.gov for the first quarter of fiscal year 2019. At that time, the RRB's obligated amount was in the top 20 for the Federal Government.

Objectives, Scope, and Methodology

The objectives of this audit were to

- assess the completeness, accuracy, timeliness, and quality of the first quarter of fiscal year 2019 financial and award data submitted by the RRB for publication on USASpending.gov; and

- assess the RRB's implementation and use of the governmentwide financial data standards established by the Office of Management and Budget (OMB) and the U.S. Department of the Treasury (Treasury).

The scope of the audit was first quarter of fiscal year 2019 financial and award data the RRB submitted for publication on USASpending.gov, and applicable procedures, certifications, documentation, and controls to achieve this process.

To accomplish the audit objectives, we

- identified criteria from the law as well as OMB governmentwide guidance;

- reviewed the *Council of the Inspectors General on Integrity and Efficiency (CIGIE) Federal Audit Executive Committee (FAEC) Inspectors General Guide to Compliance under the DATA Act* (CIGIE FAEC Guide);[2]

- interviewed applicable management, staff, and key personnel;

- assessed the internal and information system controls in place for the extraction of data from the source systems and for the reporting of data to Treasury's DATA Act Broker;

- reviewed and reconciled the first quarter of fiscal year 2019 summary-level data submitted by the RRB for publication on USASpending.gov, including Files A, B, and C;

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[1] Pub. L. No. 113-101 (2014).

[2] Unless otherwise indicated, from this point forward in the report the term "CIGIE FAEC Guide" will imply *Council of the Inspectors General on Integrity and Efficiency (CIGIE) Federal Audit Executive Committee (FAEC) Inspectors General Guide to Compliance under the Digital Accountability and Transparency Act of 2014 (DATA Act)*, (Washington, D.C.: February 14, 2019).

- reviewed a statistically valid sample from first quarter of fiscal year 2019 financial and award data submitted by the RRB for publication on USASpending.gov, including Files A, B, C, D1, and D2;

- assessed the completeness, accuracy, timeliness, and quality of the financial and award data sampled; and

- assessed the RRB's implementation and use of the 57 data elements and standards established by OMB and Treasury.

We did not assess Files E or F as the quality of this data is the legal responsibility of the awardee in accordance with terms and conditions of federal agreements. The RRB and other federal agencies are not responsible for certifying the quality of data reported by awardees.

We adhered to the overall methodology, objectives, and audit procedures outlined in the CIGIE FAEC Guide.

We considered the DATA Act date anomaly as determined by CIGIE. CIGIE identified a timing anomaly with the oversight requirements contained in the DATA Act. That is, the first Inspector General reports were due to Congress on November 2016; however, federal agencies were not required to report spending data until May 2017. To address this reporting date anomaly, the Inspectors General provided Congress with their first required reports by November 2017, one year after the statutory due date, with two subsequent reports to be submitted following a 2-year cycle. On December 22, 2015, CIGIE's chair issued a letter detailing the strategy for dealing with the Inspector General reporting date anomaly and communicated the strategy to the Senate Committee on Homeland Security and Governmental Affairs and the House Committee on Oversight and Government Reform.[3] A copy of the CIGIE letter can be found in Appendix VI.

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

We conducted our fieldwork at RRB headquarters in Chicago, Illinois, from May 2019 through October 2019.

Background

The RRB is an independent agency in the executive branch of the Federal Government. The agency administers comprehensive retirement/survivor and unemployment/sickness insurance benefit programs for railroad workers and their families under the Railroad Retirement Act and the Railroad Unemployment Insurance Act. These programs provide income protection during old age and in the event of disability, death, temporary unemployment, or sickness.

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[3] CIGIE FAEC Guide.

During fiscal year 2018, RRB paid retirement and survivor benefit payments totaling approximately $13.1 billion to about 540,000 retirement and survivor beneficiaries. RRB also paid net unemployment/sickness benefits of $100.2 million to about 25,000 claimants.

The DATA Act requires

> *…the Inspector General of each Federal agency, in consultation with the Comptroller General of the United States, shall—''(A) review a statistically valid sampling of the spending data submitted under this Act by the Federal agency; and ''(B) submit to Congress and make publically available a report assessing the completeness, timeliness, quality, and accuracy of the data sampled and the implementation and use of data standards by the Federal agency.*[4]

The DATA Act amended the Federal Funding Accountability and Transparency Act of 2006 (FFATA), which required OMB to "…ensure the existence and operation of a single searchable website, accessible by the public at no cost…."[5] The Act expanded FFATA in various aspects such as

- requiring the disclosure of direct federal agency expenditures and linkage of federal contract, loan, and grant spending information to federal programs so taxpayers and policy makers can more effectively track federal spending;

- establishing governmentwide data standards for financial data to provide consistent, reliable, and searchable governmentwide spending data that are displayed accurately for taxpayers and policy makers;

- simplifying reporting for entities receiving federal funds by streamlining reporting requirements and reducing compliance costs while improving transparency;

- improving the quality of data submitted by holding federal agencies accountable for the completeness and accuracy of the data submitted; and

- applying approaches developed by the Recovery Accountability and Transparency Board to spending across the Federal Government.

The DATA Act charged OMB and Treasury with issuing guidance on the data standards needed to implement the DATA Act and required full disclosure of federal funds on the public website USASpending.gov no later than May 2017.[6] The DATA Act further required the Secretary of the Treasury, in consultation with the Director of OMB, to ensure that the information is posted to the public website at least quarterly, but monthly when practicable. The DATA Act did not provide any additional funding dedicated to its implementation.

Treasury published 57 data definition standards and required federal agencies to report financial data in accordance with these standards for DATA Act reporting, beginning January 2017.[7] These standards ensure consistency across departments and agencies and

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[4] Pub. L. No. 113-101 (2014).
[5] Pub. L. No. 109-282 (2006).
[6] Office of Management and Budget (OMB), *Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable*, OMB Memorandum M-15-12 (Washington, D.C.: May 8, 2015).
[7] Pub. L. No. 113-101 (2014).

define the specific data elements agencies must report under the DATA Act, such as appropriation account, object class, expenditures, and program activity. Not all data elements are required for every file. This information is published in the DATA Act Information Model Schema (DAIMS), which provides agencies an overall view of the hundreds of distinct data elements included in agencies' DATA Act files.

According to OMB guidance, to ensure maximum transparency in federal spending, agencies must report each financial assistance award at the most granular level practicable while protecting personally identifiable information (PII).[8] Given the required data collections, if reporting at the single award level is not practicable, agencies may report at the county level, and if not practicable, aggregated at the state level, consistent with the following:

- Single Awards Containing PII: Agencies should report single awards at the award-level to the maximum extent practicable. If an agency captures a Federal Award Identification Number (FAIN) and other details for an award to an individual, the agency should report that award to USASpending.gov as a single, discrete record. Records reported in this way will be linked using the FAIN as the award identification, with any PII redacted by the agencies before submission.

- Aggregated Awards - County Level: If single award-level reporting is not practicable, agencies may report at the county level. If an agency does not capture a FAIN or other individual details for an award to an individual, the agency should include that award in a county-level aggregate record with other similar awards. Records reported in this way must be linked using the Unique Record Identifier (URI).

- Aggregated Awards - State Level: If neither single award-level reporting nor county-level reporting is practicable, agencies may report at the state level. Records reported in this way must be linked using the URI.

The RRB reported its financial assistance awards by aggregating the data at the county level.

The RRB's DATA Act submission was comprised of the following files, as shown in Table 1.

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[8] OMB, *Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring DATA Reliability*, OMB Memorandum M-17-04 (Washington, D.C.: November 4, 2016).

Table 1. RRB's DATA Act Files

File Name	Description	Number of Records
File A – Appropriations Account	Included the appropriations account detail information aligned to SF-133 Report on Budget Execution and Budgetary Resources (SF-133).	34
File B – Program Activity and Object Class	Included the object class and program activity detail information based on the SF-133s.	331
File C – Award Financial[a]	Included the award level financial detail information from agency financial and award systems (FMIS, PREH, MBF, and MACRO).[b]	33,125
File D1 – Award Attributes (Procurement)	Contained the award and awardee attributes for procurement sourced from Federal Procurement Data System – Next Generation (FPDS-NG).	70
File D2 – Award Attributes (Financial Assistance)	Contained the award and awardee attributes for financial assistance from Financial Assistant Broker Submission (FABS) submission process.[c]	33,057

Source: RRB OIG Analysis of Files A through D2 and OMB M-17-04, *Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring DATA Reliability*, November 4, 2016.

[a] To view the additional details and attributes of File C, see Files D1/D2 in combination with File C.

[b] Financial Management Integrated System (FMIS) is the RRB's financial system, whereas, Payment, Rate and Entitlement History File (PREH) is the system of record for payment, rates, and entitlement history. The Master and Clearance Records Online (MACRO) is a DB2 database which parallels the contents of the Railroad Unemployment Insurance Act master and clearance files, the system of record for unemployment and sickness benefits.

[c] The Financial Assistance Broker Submission (FABS) portal replaced the Award Submission Portal (ASP).

Files A through C were generated by the RRB, and Files D1 and D2 were generated from the DATA Act Broker. The DATA Act Broker extracted the agency's information from the Federal Procurement Data System – Next Generation (FPDS-NG) and the Financial Assistance Broker Submission (FABS) portal for Files D1 and D2, respectively. During the submission process, the DATA Act Broker generates warnings and errors based on Treasury-defined rules. The results of validations are displayed in severity as a separate file, which contains errors and warning messages per DAIMS Validation Rules v1.3.1, dated February 8, 2019:

- Errors must be corrected before proceeding to the next step because these validations indicate incorrect values for fundamental data elements. Agencies are unable to submit data containing errors.

- Warnings will not prevent continuing to the next step because these messages may not indicate inaccuracies in the data. The warning messages were created to alert the agency to possible issues worth further review.

We determined that File B was the primary file that fed into USASpending.gov's spending explorer. Using the explorer, a user could quickly view the RRB's first quarter of fiscal year 2019 spending as shown in Table 2.

Table 2. RRB's Reported Amounts by Federal Account – First Quarter of Fiscal Year 2019

Name and Federal Treasury Account Symbol (TAS)	Obligated Amount	Percent of Total
Social Security Equivalent Benefit Account 060-8010	$1,894,233,965	46.20 %
Railroad Retirement Account 060-8011	$1,486,791,721	36.26 %
National Railroad Retirement Investment Trust 060-8118	$377,004,812	9.20 %
Federal Payments to the Railroad Retirement Accounts 060-0113	$231,294,627	5.64 %
Limitation on Administration 060-8237	$57,007,164	1.39 %
Railroad Unemployment Insurance Trust Fund, Administrative Expenses 060-8051[a]	$45,305,894	1.11 %
Dual Benefit Payments Account 060-0111	$4,536,252	0.11 %
Limitation on the Office of the Inspector General 060-8018	$3,764,331	0.09 %
Railroad Unemployment Insurance Extended Benefit Payments 060-0117	$2,141	Less than 0.01 %
Total	$4.1 billion	100 %

Source: Data as of December 31, 2018 as it appeared on USASpending.gov.
[a] Railroad Unemployment Insurance Trust Fund, Administrative Expenses full account number was 060X8051.002.

On June 6, 2018, OMB issued new guidance that required agencies to develop a Data Quality Plan (DQP). According to *Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk* (OMB M-18-16), DATA Act reporting agencies were required to implement a DQP effective fiscal year 2019 through fiscal year 2021 at a minimum. The guidance became effective immediately. The DQP must consider incremental risks to data quality in federal spending data and any controls that would manage such risks in accordance with OMB Circular No. A-123. Once developed by the agency, quarterly certifications of data submitted by the Senior Accountable Official (SAO), or the designee should be based on the consideration of the DQP and the internal controls documented by the agency.[9]

RRB DATA Act Reporting Primary Roles and Responsibilities

First quarter of fiscal year 2019 RRB DATA Act reporting was accomplished through coordination and cooperation efforts of the Bureau of Fiscal Operations (BFO), the Bureau of the Actuary and Research (Actuary), the Office of Administration's Division of Acquisition

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[9] OMB, *Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk*, OMB M-18-16 (Washington, D.C.: June 6, 2018).

Management (AM), and RRB's contractor, CGI Federal Incorporated (CGI). According to the RRB, they assigned the following bureaus and offices with primary roles and responsibilities:

- RRB's Chief Financial Officer was designated as the SAO for RRB's DATA Act activities. OMB's DATA Act implementation guidance states that "[o]n a quarterly basis, agency Senior Accountable Officials must provide reasonable assurance that their internal controls support the reliability and validity of the agency account-level and award-level data they submit to Treasury for publication on USASpending.gov."[10]

- The RRB's SAO designee, also the DATA Act Certifier (Certifier), was appointed to certify the DATA Act files for publishing on USASpending.gov on behalf of the SAO. The Certifier was responsible for ensuring that any warnings or errors returned by the DATA Act Broker had been acknowledged and signed off by the corresponding bureau points of contact, that the summary procurement and financial assistance awards matched the summary amounts provided in File C, and they add any comments to the submission as necessary. This individual works in BFO's accounting section and reports to the SAO.

- BFO was assigned as the primary organizational unit that was responsible for compiling and reporting all applicable data for the RRB's DATA Act submission (Files A through D2). In addition, they conducted tasks associated with the roles of pre-broker reviewer, file submitter, bureau point of contact, post-broker reviewer, and contracting officer's representative for CGI.

- AM was the organizational unit that certified procurement records as complete, accurate, and timely (Files C and D1). Additionally, they were responsible for verifying, addressing, and investigating any discrepancies identified by pre and post-broker reviewers.

- Actuary was the organizational unit that certified financial assistance records as complete, accurate, and timely (Files C, D2, and their External Source FAADS+ File). Additionally, they were responsible for verifying, addressing, and investigating any discrepancies identified by pre and post-broker reviewers.

- CGI was the RRB contractor that assisted in the file generation process, performed maintenance on the pre-broker validation queries, performed maintenance on the DATA Act structured query language (SQL), assisted in the pre and post-broker review, assisted in resolving warnings or errors with the bureau points of contact, and assisted in certifying data.

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[10] OMB, *Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information*, OMB Management Procedures Memorandum (MPM) 2016-03 (Washington, D.C.: May 3, 2016).

RESULTS OF AUDIT

Our audit determined that the RRB generally submitted complete, accurate, and high quality financial and award data for its first quarter of fiscal year 2019 publication on USASpending.gov and had generally effective internal controls over its DATA Act submission. However, we identified exceptions with the 1) internal controls related to the use of a DQP, management's written assurance and statement of accountability, and the RRB's DATA Act policies and procedures, 2) accuracy of the agency's Files B submission, 3) process in addressing DATA Broker validation warnings and completing reconciliations, 4) timeliness of the SAO's DATA Act certification, and 5) completeness and accuracy of Files D1 and D2.

Quality, completeness, accuracy, and timeliness are defined in Table 3.

Further, we determined the RRB generally implemented and used the governmentwide financial data standards established by OMB and Treasury. However, we did identify improvements that could be made to the reporting of financial assistance awards containing PII and resolving gaps between authoritative data sources and RRB's actual data sources.

Table 3.   Quality, Completeness, Accuracy, and Timeliness Definitions

Attribute	Definition
Quality	▪ Data that is complete, accurate, and reported on a timely basis.
Completeness	▪ Agency Submission – Transactions and events that should have been recorded were recorded in the proper period. ▪ Data Elements – For each of the required data elements that should have been reported, the data element was reported in the appropriate Files A through D2.
Accuracy	▪ Data Elements – Amounts and other data relating to recorded transactions have been recorded in accordance with the DAIMS, Reporting Submission Specification, Interface Definition Document, the online data dictionary, and agree with the authoritative source records.
Timeliness	▪ Agency Submission – Reporting of the agency DATA Act submission to the DATA Act Broker is in accordance with the schedule established by the Treasury DATA Act Project Management Office. ▪ Data Elements – For each of the required data elements that should have been reported, the data elements were reported in accordance with the reporting schedules defined by the financial, procurement, and financial assistance requirements.

Source: CIGIE FAEC Guide.

We made 11 recommendations to address the exceptions identified. The full text of management's responses to these recommendations has been included in Appendix I and II.

RRB's Internal Controls over DATA Act Reporting were Generally Effective but Need Improvement

We determined that RRB's internal controls over its DATA Act submission were generally effective. The internal and information system controls for (1) the extraction of data from source systems and (2) the reporting of data to the DATA Act Broker were designed, implemented, and operating effectively to the extent of producing the financial assistance and award data necessary for DATA Act reporting. However, we determined the RRB could make internal control improvements related to the use of a DQP, management's written assurance and statement of accountability, and documentation of the RRB's DATA Act policies and procedures.

Consideration and Use of the RRB's Data Quality Plan Needs Improvement

The agency SAO did not base the first quarter's DATA Act submission and certification of data on the DQP because its first DQP was not prepared until August 9, 2019 – four and half months after the submission was made on March 21, 2019.

Starting in fiscal year 2019, OMB guidance established that agencies must develop a DQP to identify a control structure tailored to address identified risks. SAO quarterly certifications should be based on the considerations of the agency's DQP. Additionally, OMB guidance requires that agencies consider their DQP in their annual assurance statement on internal controls over reporting, beginning in fiscal year 2019.[11] According to OMB:

> *The Data Quality Plan should cover significant milestones and major decisions pertaining to:*
>
> - *Organizational structure and key processes providing internal controls for spending reporting.*
>
> - *Management's responsibility to supply quality data to meet the reporting objectives for the DATA Act in accordance with OMB Circular No. A-123.*
>
> - *Testing plan and identification of high-risk reported data, including specific data the agency determines to be high-risk that are explicitly referenced by the DATA Act, confirmation that these data are linked through the inclusion of the award identifier in the agency's financial system, and reported with plain English award descriptions.*
>
> - *Actions taken to manage identified risks.[12]*

Because the DQP did not exist when the first quarter 2019 data was submitted, risks to data quality in the RRB's spending data may not have been identified or managed. The RRB may also have imposed duplicative and unnecessary processes to publish their quarterly submissions, due to the lack of a clear organizational structure and key processes to provide internal controls over financial and award data reporting. If the conditions we described are not corrected, the

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[11] OMB, M-18-16.
[12] OMB, M-18-16.

completeness, accuracy, timeliness, and quality of the data submitted, or implementation and use of the data standards in future DATA Act submissions may be adversely impacted.

Management's Written Assurance and Statement of Accountability was Incomplete

During the RRB's DATA Act submission, the RRB's management (1) leveraged data quality and management controls established in statute, regulation, and governmentwide policy, (2) aligned data quality controls with the internal control and risk management strategies in OMB M-18-16, and (3) did not identify any deficiencies in internal control or other limitations that would prevent the SAO from certifying that the data submitted for publication on USASpending.gov was complete, accurate, timely, of quality, and complied with the established governmentwide financial and award data standards. However, the SAO's quarterly assurance statement, obtained from USASpending.gov, did not contain a statement of accountability to confirm the RRB's efforts to support data quality and assurances on interconnectivity/linkages across all the data files.

According to OMB guidance, "[a]s stated in MPM 2016-03 agency DATA Act SAOs or their designees must provide a quarterly assurance that their agency's internal controls support the reliability and validity of the agency account-level and award-level data reported for display on USASpending.gov."[13] In general, the required assurance is a statement of accountability to confirm an agency's efforts to support data quality. According to OMB guidance, the agency SAO assurances should be submitted quarterly through the DATA Act Broker process. This process requires the SAO to assure that the alignment among Files A through F and the data in each file submitted for display on USASpending.gov were valid and reliable.[14]

During the DATA Act submission process, the RRB identified misalignments when comparing File C and File D1; but, they did not provide comments regarding this in the quarterly assurance statement comment boxes available on the DATA Act Broker. The misalignments were among Procurement Instrument Identifier Numbers (PIID)

- 60RRBH19P0080 – $9,324.07, which appeared in File C but not in File D1;

- RRB15C006 A00005 – $86,591, which appeared in File D1 but not File C; and

- RRB17A0046 P00002 and RRB17D0001 P00002 – $0.00, which each appeared in File D1 but not in File C.

OMB guidance and DAIMS v 1.3 Practices and Procedures explain where there are legitimate differences between files, the SAO should provide categorical explanations for misalignments.[15]

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[13] OMB, M-17-04 and MPM 2016-03.
[14] Since a DATA Act submission contains a combination of many data sets, assurance over alignment requires the Senior Accountable Official (SAO) to attest to the interconnectivity/linkages (e.g. award ID linkage) across all the data in Files A, B, C, D, E, and F.
[15] OMB M-17-04 and Department of Treasury (Treasury), *DATA Act Information Model Schema (DAIMS) Practices and Procedures For DATA Broker Submissions v 1.3* (June 29, 2018).

These explanations can be entered into a separate comment box available for each file being certified. These comments are made public along with the certified files on USASpending.gov.

Further, the SAO did not attest to the interconnectivity/linkages across all the data files. We discuss linkage issues in the sections titled *The Agency did not Achieve Automatic Linkage for New Aggregate Records* and *Gaps Exist Between Authoritative Sources and Actual Sources*.

Neither the SAO nor designee knew that a statement of accountability was a quarterly requirement when they developed written statements certifying the completeness, accuracy, and timeliness of the data submitted to address previous OIG audit recommendations.[16] Instead, they attempted to address it once by stating, "[a]s the Senior Accountable Official, it is my opinion that RRB's comprehensive review process for Data Act file submissions provides the internal controls to support the reliability and validity of the data submitted to Treasury for publication on USASpending.gov under the DATA Act." Additionally, the SAO thought the designee's certification for each quarterly submission through the DATA Act Broker application was adequate.

As a result, taxpayers and policy makers could be led to believe the alignment among the RRB's Files A through F were valid and reliable, and the RRB's data in each DATA Act file submitted for display on USASpending.gov were also valid and reliable. If the conditions we described are not corrected, they may adversely impact the completeness, accuracy timeliness, and quality of the data submitted, or implementation and use of the data standards in future DATA Act submissions.

On August 9, 2019, the RRB provided OIG auditors with a draft of the SAO quarterly assurance statement that they planned to use during the next DATA Act submission. The statement was not evaluated as it was not within the scope of this audit.

RRB's DATA Act Policies and Procedures Need Improvement

The RRB's policies and procedures contained minimum standards and information for the RRB to manage and facilitate the reporting of financial and award data in accordance with the requirements of the DATA Act.[17] Even though the procedures included various controls to ensure overall quality of the data, deficiencies were identified and improvements could be made. We determined that BFO did not include Actuary's efforts in preparing File D2 in BFO's revised procedures titled, *Data Act Process Flow*, last updated on May 22, 2019.[18] Actuary compiled and reported the benefit payment information using various preexisting processes, then uploaded it to the Financial Assistance Broker Submission (FABS) portal. Once it was

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[16] Railroad Retirement Board (RRB) Office of Inspector General (OIG), *Railroad Retirement Board's Initial DATA Act Submission, While Timely, Was Not Complete or Accurate*, Report No. 18-01 (Chicago, IL; November 8, 2017).

[17] Pub. L. No. 113-101 (2014).

[18] According to the RRB, the *Data Act Process Flow* established comprehensive controls and procedures covering the submission and certification of RRB's DATA Act files, to include review of source and resulting data to be submitted. They explained that these procedures detail the contractor staff responsibilities; and the roles and responsibilities associated with ensuring accurate and complete DATA Act files for all responsible or designated RRB staff.

uploaded to FABS, it was available for download as File D2. The D2 file is the foundation of the RRB's DATA Act reporting because File C is created and generated based on information contained in Files D1 and D2. File C contained 33,125 records, of which 33,057 of them came from File D2. The 33,057 records accounted for $3.2 billion of the $4.1 billion reported on the USASpending website.[19] Additionally, we determined there were no procedures established to ensure File A and B totals matched.

Throughout our fieldwork, we had to request supplemental documentation, including flow charts, as there were limited details in the RRB's *Data Act Process Flow* on how the RRB's contractor CGI, BFO, Actuary, and AM actually compiled and converted the source data into the governmentwide financial data standards established by the OMB and Treasury.

According to Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*, "[i]nternal control comprises the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity."[20] Management should implement control activities through policies, which should be documented in the appropriate level of detail to allow management to effectively monitor the activity. Accordingly, management is responsible for designing policies and procedures to fit the agency's situation.

BFO did not object to our observation relating to BFO not including Actuary's effort in preparing Files C and D2 in its revised procedures. But, they did not provide an explanation regarding why this omission occurred. On August 9, 2019, the RRB provided OIG auditors with an updated *Data Act Process Flow*. We did not evaluate the new *Data Act Process Flow* because it was not within the scope of this audit.

The risk of the RRB's controls failing at anytime is high due to the lack of written, detailed, and inclusive procedures, which may adversely impact the completeness, accuracy timeliness, and quality of the data submitted, or implementation and use of the data standards in future DATA Act submissions.

Recommendations

We recommend that the Bureau of Fiscal Operations

1. base the Railroad Retirement Board's DATA Act quarterly submission and certification on the Railroad Retirement Board's Data Quality Plan;

2. provide a quarterly assurance statement that the agency's internal controls support the reliability and validity of the agency account-level and award-level data reported for display on USASpending.gov in accordance with Office of Management and Budget Management Procedures Memorandum 2016-03 and Memorandum M-17-04. This statement should include assurances on interconnectivity/linkages across all the data in Files A, B, C, D, E, and F;

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[19] See Table 1 and Table 2 for additional details.
[20] Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*, GAO 14-704G (Washington, D.C.: September 2014).

3. ensure the Senior Accountable Official or the Senior Accountable Official's designee, including the DATA Act Certifier, obtain DATA Act training to ensure they have an understanding of the DATA Act's required written assurance statement, including the statement of accountability; and

4. update and expand the Railroad Retirement Board's *DATA Act Process Flow* to include the Bureau of Actuary and Research's efforts in preparing the financial assistance award portion of the DATA Act submission.

Management's Comments and Our Response

For recommendations 1, 2, 3, and 4, BFO concurred with our recommendations. For recommendation 4, BFO stated

> *We concur that the DATA Act Process Flow needed to be updated to include discussion of Bureau of Actuary and Research's efforts in preparing the financial assistance award portion of the DATA Act submission. As such, corrective action was taken during the course of your audit and the updated document was provided to your office on August 9, 2019.*

We were able to conduct a review of the August 9, 2019 documents after the exit conference and issuance of the draft report. We determined that the updated *DATA Act Process Flow* in conjunction with the RRB's DQP met the intent of recommendation 4. Therefore, we consider recommendation 4 implemented and closed. Please note that a full review of the RRB's new DQP was not completed during the course of this audit. In our opinion, auditors must consider both documents when referring to the RRB's policies and procedures as they related to DATA Act reporting. This should be noted for future reviews and audits.

RRB's DATA Act Certification and Submission were Generally Complete but Need Improvement on Timeliness and Accuracy

The RRB's first quarter of fiscal year 2019 DATA Act submission was generally complete and partially accurate at the summary-level, but not timely. We determined the SAO designee submitted and certified the data for publication on USASpending.gov one day late. To be considered timely, the SAO's certification should have been provided on or before March 20, 2019. Even though the submission was generally complete and partially accurate, there is need for improvement in addressing DATA Broker validation warnings, conducting reconciliations, obtaining interconnectivity/linkages across all data files, and timeliness.

The Agency's Submission for Files A, B, and C was Generally Complete

The RRB's first quarter of fiscal year 2019 DATA Act submission was generally complete. We evaluated RRB's Files A, B, and C that were submitted to the DATA Act Broker. Our evaluation consisted of Treasury Account Symbol (TAS) to SF-133 comparisons, file to file comparisons, and a review of Broker warnings. Table 4 summarizes our comparisons.

Table 4. OIG Evaluation of Files A, B, and C

File Name	Was the File Complete?	If yes or no, why?	Effect	Percent Complete
File A	Yes	▪ Matched SF-133s.		100 %
File B	Yes	▪ All TASs in File A were accounted for in File B.		100 %
File C	No	▪ Micro-purchases were included in File D1 but not File C.	Understated by $86,591[a]	99 %

Source: RRB OIG analysis of Files A, B, and C.
[a] After examining File C for completeness, linkage to File B, and linkage to Files D1/D2, we determined File C was missing one record in an amount of $86,591. However, this record was not required to be reported in File C per DAIMS v 1.3 Practices and Procedures. Micro-purchase transactions are not required to be entered into FPDS-NG. Information entered into FPDS-NG directly effects File D1 which directly effects File C.

Accuracy of Summary-Level Data for Files A and B and Linkages Need Improvement

We determined that BFO submitted inaccurate data for File B on USASpending.gov and did not ensure linkages were automatic between the RRB's financial and award systems. There is need for improvement in addressing Broker validation warnings and conducting reconciliations. Our test work noted variances between Files A, B, and C. See Tables 5 and 6 for details pertaining to Files A and B.

The Agency's File B was Inaccurate
We determined that File A was accurate when matched against comparable information found in the RRB's SF-133. However, File B was inaccurate when matched against File A and when matched against the President's Budget.[21]

We conducted two different comparisons between Files A and B. In the first, we compared gross outlays and in the second, we compared obligation amounts. According to USASpending.gov, an outlay occurs when federal money is actually paid out, not just promised to be paid. A promise to pay is known as an obligation and is a binding agreement. An agency incurs an obligation, for example, when it places an order, signs a contract, awards a grant, purchases a service, or takes other actions that require it to make a payment.

As shown in Table 5, we compared gross outlay amounts and determined File B was understated by $8.1 million. According to DAIMS validation rule A18, gross outlay amount by TAS found in File A should be equal to the sum of all gross outlay amount by program object class in File B.

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[21] OMB, *Appendix, Budget of the United States Government, Fiscal Year 2019*, Detailed Budget Estimates (Washington, D.C.: February 2018).

Table 5.   File A to File B Variances Rule A18

TAS	File A's Sum of Gross Outlay Amount	File B's Sum of Gross Outlay Amount	Difference (File A - File B)
8010	(1,823,287,650.45)	(1,824,741,891.22)	1,454,240.77
8011	(1,402,765,534.79)	(1,402,827,144.22)	61,609.43
8118	(377,004,811.87)	(377,004,811.90)	0.03
0113	(231,294,626.89)	(231,294,626.90)	0.01
8237	(37,534,268.34)	(28,035,199.47)	(9,499,068.87)
8051	(32,045,783.21)	(31,884,543.59)	(161,239.62)
0111	(4,506,286.34)	(4,540,128.61)	33,842.27
8018	(3,445,140.51)	(3,445,140.51)	0.00
0114	(5,561.95)	0.00	(5,561.95)
0117	(3,280.02)	907.18	(4,187.20)
Total	(3,911,892,944.37)	(3,903,772,579.24)	(8,120,365.13)

Source: RRB OIG analysis and review of Files A and B. DATA Act Information Model Schema (DAIMS) Validation Rules v1.3.1, revision date February 8, 2019.

As shown in Table 6, we compared obligation amounts and determined File B was overstated by $1.15 million. According to DAIMS validation rule A19, File A's obligations incurred total by TAS should be equal to the negative sum of obligations incurred by program object class in File B as of the same reporting period.

Table 6. File A to File B Variances Rule A19

TAS	USASpending.gov	File A's Sum of Obligations Incurred	File B's Sum of Obligations Incurred	Difference (File A - File B)
8010	1,894,233,965	1,894,233,964.92	(1,894,233,965.04)	(0.12)
8011	1,486,791,721	1,486,791,720.77	(1,486,791,720.98)	(0.21)
8118	377,004,812	377,004,811.87	(377,004,811.90)	(0.03)
0113	231,294,627	231,294,626.89	(231,294,626.90)	(0.01)
8237	57,007,164	56,562,459.30	(57,007,164.40)	(444,705.10)
8051	45,305,894	45,305,894.07	(45,305,894.07)	(0.00)
0111	4,536,252	4,537,830.46	(4,536,252.45)	1,578.01
8018	3,764,331	3,057,376.36	(3,764,331.30)	(706,954.94)
0117	2,141	2,141.32	(2,141.32)	(0.00)
0114	--	--	--	--
Total	4,099,940,908	4,098,790,825.96	(4,099,940,908.36)	(1,150,082.40)

Source: RRB OIG analysis and review of Files A, B, and USASpending.gov's Spending Explorer tool. DATA Act Information Model Schema (DAIMS) Validation Rules v1.3.1, revision date February 8, 2019.

During RRB's pre-certification process through the Broker, misalignments were identified between Files A and B but not addressed. The SAO designee could not support why this occurred and claimed that the differences between Files A and B were due to timing and were not material. Further, the designee did not reconcile or validate File B to ensure it was accurate. During our fieldwork, BFO tried to determine the cause of the differences and claimed that the same issue has not recurred since they revised their reconciliation procedures. After further review, we determined that the raw File B CGI generated matched File A. This led us to believe that CGI could have potentially used the wrong File B or had a breakdown in their SQL coding and that it was not a timing issue. We shared this information with RRB management during the exit conference.

Additionally, we determined File B's program activity names and codes were inaccurate when compared to the President's Budget:[22]

- In File B, TAS 0114 and 0117 had a code of 0003 (Railroad Unemployment Insurance Trust Fund), yet neither fund in the President's Budget contained that code.

- The President's Budget contained code 0002 (Railroad Social Security Equivalent Benefit) under TAS 8237 and 8018 yet this code was absent from File B.

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[22] OMB, *Appendix, Budget of the United States Government, Fiscal Year 2019*, Detailed Budget Estimates.

- File B contained a code that did not match the program activity name under TAS 8237. The code 0001 was used for (Medicare and other reimbursements) instead of the correct code 0801.[23]

We believe the discrepancies with File B and the President's Budget was attributable to CGI's SQL command statement used to query the Financial Management Integrated System (FMIS) to prepare File B as the program activity names and codes were populated based on a conditional script.

Lack of reconciliation procedures and inaction towards Broker warnings resulted in the submission of inaccurate, unreliable, and inconsistent summary level data. Since File B was inaccurate, the primary USASpending.gov screen for the RRB was also inaccurate and overstated by $1.15 million or 0.03 percent of total obligations reported.[24] As a result, taxpayers and policy makers could not fully rely on the RRB's data to track federal spending more effectively. If left unchecked, this could lead to decreased accountability and transparency in federal spending across the Federal Government.

The Agency did not Achieve Automatic Linkage for New Aggregate Records
The RRB did not meet OMB's deadline for automatic linkages. BFO did not ensure URI linkages were automatic between the RRB's financial and award systems in accordance with OMB guidance.[25] For the RRB's DATA Act reporting, URIs are used only for financial assistance awards and not procurement awards.[26]

According to OMB guidance, agencies that are unable to include the URI in management and financial systems for county level aggregate records displayed beginning May 2017 may manually link the award and financial data in their submission (award financial file - File C) using URI. All agencies will be required to achieve the automatic linkage for new aggregate records between the financial and award management systems by October 1, 2018.[27]

Actuary explained that URIs were manually created when they prepared the financial assistance awards data for the monthly FABS reporting. BFO explained that the RRB is not currently in a position to use FMIS as the source of data for financial assistance awards because there is no automated interface between FMIS and its benefit paying systems. We discuss this further in the section titled *Gaps Exist Between Authoritative Sources and Actual Sources.*

Lack of automatic linkages, could lead to decreased user capability. According to OMB, they want users to have the same spending lifecycle view as provided through use of the Award ID linkage.

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[23] Potentially stemming from the same program activity name issue, we found a variance between File C and File B's program activity names for PIID 60RRBH19F0079, Parent Award ID GS35F198CA.
[24] We were unable to view the effect of the understated gross outlay total of $8.1 million through the USASpending.gov's spending explorer tool.
[25] OMB, M-17-04.
[26] As defined per DATA.gov, a Unique Record Identifier (URI) is an agency defined identifier that (when provided) is unique for every reported action.
[27] OMB, M-17-04.

The Agency's Submission was not Timely

The SAO designee submitted and certified the RRB's first quarter of fiscal year 2019 financial and award data for publication on USASpending.gov one day late. The submission and certification occurred on March 21, 2019.

According to the CIGIE FAEC guide, an agency submission should be considered timely when the submission by the agency to the DATA Act Broker is in accordance with the reporting schedule established by the Treasury DATA Act Project Management Office, which is traditionally within 45 days of quarter end. Due to a government shutdown, the due date for agency submissions for first quarter of fiscal year 2019 was extended to March 20, 2019.

In response to our entrance conference, BFO provided us DATA Act submission documents and emails. One email included the new due date of Wednesday, March 20, 2019, which the SAO designee forwarded to the appropriate RRB DATA Act points of contact. In contradiction to the emails, the SAO designee stated they were confused about the due date as it was changed due to a partial government shutdown. According to the SAO designee, they tried to obtain the submission deadline schedule from MAX.gov but could not access it at the time.

Late DATA Act submissions could contribute to decreased accountability and transparency in federal spending across the Federal Government and the prevention of taxpayers and policy makers to track federal spending more effectively.

Sample Results – The RRB's Data was of Higher Quality

We determined that RRB's data was considered of **Higher** quality based on the CIGIE FAEC Guide. The Higher quality rating was determined as a result of our statistically random sample shown in Appendix III.

Based on the sample, the RRB's projected error rates for completeness, accuracy, and timeliness were 0.00 percent, 0.43 percent, and 0.00 percent, respectively. The highest of the three error rates was used as the determining factor of quality, which was 0.43 percent. Using Table 7, the rate of 0.43 percent placed the RRB in the Higher category.

Table 7. Levels of Data Quality

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

Source: CIGIE FAEC Guide.

As part of the statistically valid random sample of 385 records, we tested 52 of the 57 data elements for completeness, accuracy, and timeliness.[28] To conduct the data element analysis,

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[28] Per CIGIE FAEC Guide, we were not required to test all 57 data elements. See Appendix IV for details.

we first had to determine if the element was required or applicable per award type, aggregation type, and CIGIE FAEC guidance. See Appendix IV for information on the 52 tested data elements.

The substantial decrease in error rate for the sample was attributed to CIGIE's 2019 prescribed sampling approach, the aggregation of data, and the RRB's existing financial assistance award reporting process. The RRB improved its accuracy error rate for the sample from 91 percent to 0.43 percent in two years.

This occurred partially because the composition of the sample universe changed from 2017, including the approach. The 2017 auditors were limited to sampling solely from File D1, which consisted of procurement awards only, rather than from the preferred File C, which also included financial assistance awards. For the 2017 audit, the team determined they could not sample from File C because it was missing two months of financial assistance award data. Therefore, it was incomplete and not suitable for sampling. When we conducted our suitability for sampling test of File C in 2019, we determined it was complete and could follow CIGIE's sampling methodology. Therefore, we sampled from File C which contained 384 financial assistance awards and 1 procurement award. Further, the 2017 sampling results were concluded on a pass or fail basis, whereas, this audit's error rate conclusion was based on the numerical average of the percentage of actual errors of individual data elements in each sample.

Additionally, we attributed the improved error rate to the financial assistance award reporting requirements which allowed for an aggregation of data. This reduced the amount of individual information reported and the amount of unique data to be tested. In contrast, procurement transactions contained a variety of information unique to each transaction and criteria. Lastly, the RRB compiled its financial assistance award data based on previously established FAADS+ reporting process, which was already consistent with DATA Act requirements.

For the fiscal year 2019 errors, we determined the majority of the errors found pertained to the inaccurate use of FAIN, data element (DE) 34, while reporting aggregate records.[29] As described in the section titled *Some Financial Assistance Awards Containing Personally Identifiable Information were Incorrectly Reported,* Actuary did not appropriately apply OMB guidance when reporting financial assistance awards containing PII as they used FAIN to distinguish foreign benefit payments from domestic instead of using FAIN to report a single award containing PII.[30] FAIN is intended to be used for individual records not aggregates.

Additionally, we found a few errors pertaining to the one procurement transaction sampled. We found accuracy errors with Appropriations Account (DE 51) in File C and Legal Entity Address (DE 5), Award Type (DE 16), Period of Performance Start Date (DE 26), Ordering Period

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[29] As defined on DATA.gov, a Unique Record Identifier (URI) is an agency defined identifier that (when provided) is unique for every reported action. The Federal Award Identification Number (FAIN) is the unique ID within the Federal agency for each (non-aggregate) financial assistance award.
[30] OMB, M-17-04.

End Date (DE 29), and Primary Place of Performance Address (DE 30) in File D1. The remaining errors pertained to other financial assistance awards. For details refer to Appendices III and IV.

Recommendations

We recommend Bureau of Fiscal Operations

5. ensure a reconciliation between Files A, B, C, D1, and D2 occur before the Railroad Retirement Board's DATA Act submission and certification is finalized each quarter;

6. ensure DATA Act Broker warnings are addressed each quarter, if necessary, document any misalignments among Files A, B, C, D1, and D2 that were submitted for display on USASpending.gov;

7. update and expand the Railroad Retirement Board's *DATA Act Process Flow* to include the Railroad Retirement Board's DATA Act reconciliation processes for Files A, B, C, D1, and D2; and

8. develop a process to ensure the DATA Act Certifier provides the Railroad Retirement Board's DATA Act submission and certification on or before each quarterly due date.

Management's Comments and Our Response

For recommendations 5, 6, 7, and 8, BFO concurred with our recommendations. For recommendation 7, BFO stated

> *We concur that the DATA Act Process Flow needed to be updated to include discussion of Railroad Retirement Board's DATA Act reconciliation processes for Files A, B, C, D1, and D2. As such, corrective action was taken during the course of your audit and the updated document was provided to your office on August 9, 2019.*

We were able to conduct a review of the August 9, 2019 documents after the exit conference and issuance of the draft report. We determined that the updated *DATA Act Process Flow* in conjunction with the RRB's DQP met the intent of recommendation 7. Therefore, we consider recommendation 7 implemented and closed. Please note that a full review of the RRB's new DQP was not completed during the course of this audit. In our opinion, auditors must consider both documents when referring to the RRB's policies and procedures as they related to DATA Act reporting. This should be noted for future reviews and audits.

The RRB's Implementation and Use of the Data Standards Could be Improved

We determined the RRB generally implemented and used the governmentwide financial data standards for spending information as developed by OMB and Treasury. However, we noted that improvements could be made to the reporting of financial assistance awards containing PII and resolving gaps between authoritative sources and actual sources.

Some Financial Assistance Awards Containing Personally Identifiable Information were Incorrectly Reported

As previously cited, Actuary did not appropriately apply OMB M-17-04 guidance when reporting financial assistance awards containing PII as they used FAIN to distinguish foreign benefit payments from domestic instead of using FAIN to report a single award containing PII.[31]

According to OMB guidance, to ensure maximum transparency in federal spending, agencies must report each financial assistance award at the most granular level practicable while protecting PII.[32] Given the required data collections, if reporting at the single award level is not practicable, agencies may report at the county level, and if not practicable, aggregated at the state level. Actuary reports RRB's financial assistance awards aggregated at the county level, therefore, records reported this way must be linked using the URI.

According to Actuary, Treasury advised the RRB to report foreign financial assistance awards using FAIN. Actuary obtained this advice from Treasury when DATA Act reporting first started.

The RRB's erroneous use of FAIN in DATA Act reporting could lead to user misinterpretation as a specific bundle of awards would be mistakenly presented as a single award.

Gaps Exist Between Authoritative Sources and Actual Sources

BFO and Actuary did not resolve gaps between the DATA Act authoritative sources and RRB's actual sources. BFO explained the financial assistance data elements do not reside in the agency's financial system (FMIS) because there is no automated interface between the RRB's benefit paying systems and the financial system. Conversely, BFO explained the required data elements for the financial assistance portion of File C were extracted from the benefit paying systems and sent to CGI as comma separated value files; and, they were the same files that were uploaded, validated, and published to FABS.[33]

According to OMB guidance, the authoritative source for File C's data is the agency's financial system. Our evaluation and comparison of authoritative sources versus actual sources for DATA Act is shown in Table 8, which includes a condensed version of RRB's DATA Act File A through D2 creation and generation process.[34]

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[31] As defined per DATA.gov, a Unique Record Identifier (URI) is an agency defined identifier that is unique for every reported action. The Federal Award Identification Number (FAIN) is the unique ID within the federal agency for each (non-aggregate) financial assistance award.

[32] OMB, M-17-04.

[33] According to Microsoft, comma separated value files, often known as a .CSV, are simple text files with rows of data where each value is separated by a comma.

[34] OMB, MPM 2016-03 and M-17-04.

Table 8.   DATA Act Authoritative Source and RRB's Source System

File Name	DATA Act Authoritative Source	RRB's DATA Act Reporting Process (Source Systems and Files)
File A Appropriations	SF-133 derived from GTAS data[a]	CGI generates File A from GTAS-133.
File B Object Class Program Activity	SF-133 derived from GTAS data[a]	CGI generates File B from FMIS database using SQL, which matches GTAS-133.
File C Award Financial - Procurement	Financial Systems	BFO/CGI generates this portion of File C from RRB's Financial System (FMIS) using SQL. Acquisitions reviews the FMIS extracted File C for accuracy.
File C Award Financial - Financial Assistance	Financial Systems	BFO/CGI generates this portion of File C from conversion files derived from an Actuary produced external source file.
File D1 Procurement Award Attributes	Federal Procurement Data System – Next Generation (FPDS-NG)	BFO/CGI generates File D1 from DATA Act Broker. DATA Act Broker generates D1 from FPDS-NG. Acquisitions verifies accuracy of File D1 against their paper contract files and electronic contract files in FMIS.
File D2 Financial Assistance Award Attributes	Agency Award Management Systems or Files and SAM	BFO/CGI generates File D2 from DATA Act Broker. DATA Act Broker generates D2 from FABS. Actuary produces the FABS file also known as the external source file FAADS+. Actuary prepares the FAADS+ file from PREH, MBF, and MACRO, the RRB's applicable systems of record.

Source: RRB OIG analysis of the RRB's DATA Act reporting process, OMB MPM 2016-03, and OMB M-17-04.
[a] Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS)

According to BFO, they did not identify any other gaps except the ones described in Table 8 since the remaining required data elements in File A, File B, and File C (procurement only) reside in the RRB's financial system (FMIS).

The gaps occurred because the RRB is not currently in a position to use FMIS as the source of data for financial assistance awards. BFO stated that it may be possible to request a modification of the system to periodically accept and store financial assistance data for File C processing in order to fit the prescribed definition of authoritative source. BFO said that such a system modification would have any effect on the timeliness or accuracy of DATA Act reporting beyond the current process. Gaps could have a negative impact on the timeliness or effectiveness of RRB's DATA Act reporting and could complicate the reporting for the RRB.

Recommendations

We recommend the Bureau of Actuary and Research

9. ensure financial assistance awards containing personally identifiable information are reported in accordance with Office of Management and Budget Memorandum M-17-04; and

10. ensure DATA Act file assistance award preparers obtain training over the reporting of financial assistance awards containing personally identifiable information. For example, financial assistance award should be reported at the most granular level practicable while protecting personally identifiable information. The RRB and Bureau of Actuary and Research should consider the different available Record Types as described in Appendix V.

We recommend the Bureau of Fiscal Operations

11. develop a plan to obtain an automated interface between the RRB's benefit paying systems and the RRB's financial system that would ensure the RRB is in compliance with Office of Management and Budget Management Performance Memorandum 2016-03 and Office of Management and Budget Memorandum M-17-04.

Management's Comments and Our Response

For recommendations 9 and 10, Actuary concurred with our recommendations. However, Actuary has not provided target completion dates in its management comments.

For recommendation 11, BFO concurred with our recommendation and stated

> *As agreed to by the Audit Manager via discussion on October 30, 2019, RRB will meet the intent of this recommendation by discussing this matter further with the Office of Management Budget.*

APPENDIX I: MANAGEMENT COMMENTS

UNITED STATES GOVERNMENT

MEMORANDUM

FORM G-115f (1-92)
RAILROAD RETIREMENT BOARD

November 4, 2019

TO : Debra Stringfellow-Wheat
Deputy Assistant Inspector General for Audit

FROM : Shawna R. Weekley
Chief Financial Officer

SHAWNA
WEEKLEY

Digitally signed by SHAWNA
WEEKLEY
DN: c=US, o=U.S. Government,
ou=Railroad Retirement Board,
cn=SHAWNA WEEKLEY,
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Date: 2019.11.04 16:09:28 -06'00'

SUBJECT : Management Response: Draft – Audit of Railroad Retirement Board's
Compliance with the Digital Accountability and Transparency Act of 2014
Submission for the First Quarter of Fiscal Year 2019

This response serves to address the recommendations cited in the referenced draft audit report
received on October 29, 2019. Additionally, this response reflects the agreed upon path forward
concerning recommendations number 4, 7, and 11 as discussed with the Audit Manager on
October 30, 2019.

The referenced draft audit report recommends that the Bureau of Fiscal Operations:

Recommendation 1: Base the Railroad Retirement Board's DATA Act quarterly submission and
certification on the Railroad Retirement Board's Data Quality Plan.

Management Response: Concur. Estimated completion date May 31, 2020.

Recommendation 2: Provide a quarterly assurance statement that the agency's internal controls
support the reliability and validity of the agency account-level and award-level data reported for
display on the USASpending.gov in accordance with Office of Management and Budget
Management Procedures Memorandum 2016-03 and Memorandum M-14-04. This statement
should include assurances on interconnectivity/linkages across all the data in Files A, B, C, D, E,
and F.

Management Response: Concur. Estimated completion date May 31, 2020.

Recommendation 3: Ensure the Senior Accountable Official or the Senior Accountable Official's
designee, including the DATA Act Certifier, obtain DATA Act training to ensure they have an
understanding of the DATA Act's required written assurance statement, including the statement
of accountability.

Management Response: Concur. Estimated completion date March 31, 2020.

Recommendation 4: Update and expand the Railroad Retirement Board's *DATA Act Process Flow* to include the Bureau of Actuary and Research's efforts in preparing the financial assistance award portion of the DATA Act submission.

> *Management Response:* We concur that the *DATA Act Process Flow* needed to be updated to include discussion of Bureau of Actuary and Research's efforts in preparing the financial assistance award portion of the DATA Act submission. As such, corrective action was taken during the course of your audit and the updated document was provided to your office on August 9, 2019. As discussed with the Audit Manager, we believe that no further corrective action is necessary on this matter. Therefore, and as agreed to by the Audit Manager on October 30, 2019, please either characterize this recommendation as "implemented" in the final report or remove it in its entirety.

Recommendation 5: Ensure a reconciliation between Files A, B, C, D1, and D2 occur before the Railroad Retirement Board's DATA Act submission and certification is finalized each quarter.

> *Management Response:* Concur. Estimated completion date May 31, 2020.

Recommendation 6: Ensure DATA Act Broker warnings are addressed each quarter, if necessary, document any misalignments among Files A, B, C, D1, and D2 that were submitted for display on USASpending.gov.

> *Management Response:* Concur. Estimated completion date May 31, 2020.

Recommendation 7: Update and expand the Railroad Retirement Board's *DATA Act Process Flow* to include the Railroad Retirement Board's DATA Act reconciliation processes for Files A, B, C, D1, and D2.

> *Management Response:* We concur that the *DATA Act Process Flow* needed to be updated to include discussion of Railroad Retirement Board's DATA Act reconciliation processes for Files A, B, C, D1, and D2. As such, corrective action was taken during the course of your audit and the updated document was provided to your office on August 9, 2019. As discussed with the Audit Manager, we believe that no further corrective action is necessary on this matter. Therefore, and as agreed to by the Audit Manager on October 30, 2019, please either characterize this recommendation as "implemented" in the final report or remove it in its entirety.

Recommendation 8: Develop a process to ensure the DATA Act Certifier provides the Railroad Retirement's DATA Act submission and certification on or before each quarterly due date.

> *Management Response:* Concur. Estimated completion date May 31, 2020.

Recommendation 11: Develop a plan to obtain an automated interface between the RRB's benefit paying systems and the RRB's financial system that would ensure the RRB is in compliance with Office of Management and Budget Management Performance Memorandum 2016-03 and Office of Management and Budget Memorandum M-17-04.

Management Response: Concur. As agreed to by the Audit Manager via discussion on October 30, 2019, RRB will meet the intent of this recommendation by discussing this matter further with the Office of Management Budget. Estimated completion date December 31, 2019.

cc: Shanon Holman, Audit Manager
        John Walter, Chief of Accounting and Budget
        Jeff Baer, Director of Audit Affairs and Compliance and
                Acting Chief of Treasury, Debt Recovery and Financial Systems
        Tim Hogueisson, Associate Director of Audit Affairs and Compliance
        Mario Moreno Jr., Accounting Officer
        Herbert Kwan, Financial Program & Management Analyst

APPENDIX II: MANAGEMENT COMMENTS

UNITED STATES GOVERNMENT

MEMORANDUM

FORM G-115! (1-92)

RAILROAD RETIREMENT BOARD

November 4, 2019

TO   : Debra Stringfellow-Wheat
           Deputy Assistant Inspector General for Audit

FROM   : Frank J. Buzzi   *Frank J. Buzzi*
           Chief Actuary

SUBJECT : Bureau of the Actuary and Research's response to the Office of Inspector
           General's Draft – Audit of Railroad Retirement Board's Compliance with the
           Digital Accountability and Transparency Act of 2014 Submission for the
           First Quarter of Fiscal Year 2019

In response to your memorandum of October 29, 2019, the Bureau of the Actuary and
Research (BAR) has the following comments regarding the recommendations made in the
Draft – Audit of Railroad Retirement Board's Compliance with the Digital Accountability
and Transparency Act of 2014 Submission for the First Quarter of Fiscal Year 2019 report.

Recommendation #9:
- "ensure financial assistance awards containing personally identifiable information
  are reported in accordance with Office of Management and Budget Memorandum
  M-17-04"

BAR agrees with the recommendation and will review the Office of Management and
Budget Memorandum M-17-04. After the review, we will look at all procedures and
processes to ensure that we are reporting financial assistance awards in accordance
with the standards set in the memorandum.

Recommendation #10:
- "ensure DATA Act file assistance award preparers obtain training over the
  reporting of financial assistance awards containing personally identifiable
  information. For example, financial assistance award should be reported at the
  most granular level practicable while protecting personally identifiable
  information. The RRB and Bureau of Actuary and Research should consider the
  different available Record Types as described in Appendix IV"

BAR agrees with the recommendation. All Data Act preparers will be trained on how
to report financial assistance awards with personally identifiable information.
Training will consist of reading updated DAIMS practices and procedures, release

-2-

notes, and other documents released by Treasury/OMB as well as internal instructions.

BAR will review the DAIMS v 1.4 procedure and then consider which record types are appropriate for our federal assistance submissions.

cc: Michael Rizzo, Supervisory Statistician
       Sheryl Enders, Assistant Chief
       Sandra Delaney, Economist Statistician
       Ana M. Kocur, General Counsel
       Jeffrey G. Baer, Director of Audit Affairs and Compliance
       Timothy Hogueisson, Associate Director of Audit Affairs and Compliance
       Shanon Holman, Supervisory Auditor

APPENDIX III: SAMPLING METHODOLOGY

This appendix presents the methodology and results of our statistical sample to assess the completeness, accuracy, timeliness, and overall quality of selected required data fields submitted as part of Railroad Retirement Board's (RRB) Digital Accountability and Transparency Act of 2014 (DATA Act) for File C.

Scope

As recommended by the *Council of the Inspectors General on Integrity and Efficiency (CIGIE) Federal Audit Executive Committee (FAEC) Inspectors General Guide to Compliance under the DATA Act* (CIGIE FAEC Guide), our sample was selected from the award financial detail data included in RRB's DATA Act File C submission for the first quarter of fiscal year 2019, submitted for publication on USASpending.gov. This file consisted of financial assistance awards (benefit payments) and procurement transactions for the period October 1, 2018 through December 31, 2018. This universe included financial assistance awards (benefit payments) and procurement award transactions (new awards and modifications to existing awards) made by RRB. The universe consisted of 33,125 award financial detail records found in File C. Of the 33,125 records, 68 were procurement award and 33,057 were financial assistance awards.

Review Methodology

We used attribute sampling to test the completeness, accuracy, and timeliness of data reported for each record in File C. A record is considered a row in the data file within File C. A record could be a portion of a transaction or award activity and not necessarily the whole transaction or award activity. In our sample, a sampling unit is either a procurement award identified with unique Procurement Instrument Identifier Numbers (PIID) or financial assistance award identified with the Financial Assistance Identifier Numbers (FAIN) or Unique Record Identifiers (URI). All sampling units in the universe were eligible for random sample selection.

We selected our sample from procurement and benefit payment transactions in File C because the file was deemed suitable for sampling according to the CIGIE FAEC Guide.

Based on sampling criteria contained in guidance for this audit, the sample had an expected error rate of 50 percent, desired precision rate of 5 percent, and desired confidence level of 95 percent. This resulted in a sample size of 385 transactions, which is at the limit according to the CIGIE FAEC Guide. We selected a statistically valid simple random sample using TeamMate Analytics software. OIG transactions were not selected in our sample. Once the sample was selected from File C, we

1. confirmed the sample selected was included in File D1 to test corresponding D1 data elements;
2. confirmed the financial assistance awards selected matched the FAIN/URI in File D2 to test corresponding data elements;
3. determined the aggregate records were reported consistently with OMB M-17-04;

4. determined if the data element was required and included for the record selected;

5. determined the accuracy of applicable data elements in Files D1 and D2;

6. determined the timeliness of data elements;

7. calculated and projected the overall error rates; and

8. determined the overall quality of data sampled based on a scale of Higher, Moderate, or Lower.

We used CIGIE FAEC's *Testing Results Spreadsheet* tool in summarizing the results of the detailed record-level test of each sample and each of the data elements for Files C, D1, and D2. According to the CIGIE FAEC Guide, completeness, accuracy and timeliness of data elements will be tested independently of each other but may overlap.[35] An error of one kind does not preclude nor assume an error of another kind.

For completeness, we considered the sample item or data element to be an error when the data element fields was left empty or if a data element that was required to be reported, was not reported. For accuracy, we considered the sample item or data element to be an error if the data did not agree with the authoritative source records. For timeliness, we considered the sample item or data element to be an error if the data reported was not reported within the quarter in which it occurred; was not reported in FPDS-NG within 3 business days after contract award; or was not reported within 30 days after award, in accordance with FFATA.

During our sampling, we made a decision to test the 384 financial assistance award records against Treasury's Record Type 1 criteria because the RRB erroneously used FAIN instead of URI, therefore, incorrectly reported the associated record as Record Type 2.[36] This effected 5 of the 384 financial assistance award records sampled. Aggregate reporting criteria is shown in Appendix V.

We calculated the overall error rate for completeness, accuracy, and timeliness for each sample item and data element based on the results of the testing of the data elements found in Appendix IV and CIGIE FAEC's *Testing Results Spreadsheet* tool as shown in Table 9.

For quality, we used the results of the statistical sample in order to provide a range of results. If the highest error rate of completeness, accuracy and timeliness is between 0 percent and 20 percent then the quality would be considered Higher. If the highest error rate is between 21 percent and 40 percent then the quality would be considered Moderate. If the highest error rate is 41 percent or more, then the quality would be considered Lower.

Results

We reviewed a sample of 385 award financial detail, drawn from a population of 33,125 records in File C. The data element tested and results of tests for the attributes of completeness, accuracy, and timeliness for each data element are detailed in Appendix IV. The sample tested

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[35] Refer to Appendix IV for data element analysis.
[36] *Source*: U.S. Dept. of Treasury, *DATA Act Information Model Schema (DAIMS) Practices and Procedures for DATA Act Broker Submissions Version 1.3*, (June 29, 2018).

and results of each individual sample was based on CIGIE FAEC's *Testing Results Spreadsheet* tool and maintained in our audit files. In order to provide the stakeholders with easy to discern information regarding the 385 samples, we provided an extract of our testing spreadsheet in Table 9.

Table 9. RRB Results Per Sample Record

A	B	C	D	E	F	G	H
Sample Record #	**Total # Data Elements**	**# Incomplete**		**# Inaccurate**		**# Untimely**	
27	40	0	0.00 %	8	20.00 %	0	0.00 %
60	40	0	0.00 %	8	20.00 %	0	0.00 %
92	40	0	0.00 %	2	5.00 %	0	0.00 %
127	40	0	0.00 %	2	5.00 %	0	0.00 %
137	40	0	0.00 %	2	5.00 %	0	0.00 %
138	40	0	0.00 %	8	20.00 %	0	0.00 %
159	40	0	0.00 %	8	20.00 %	0	0.00 %
161	44	0	0.00 %	6	13.64 %	0	0.00 %
190	40	0	0.00 %	2	5.00 %	0	0.00 %
239	40	0	0.00 %	2	5.00 %	0	0.00 %
285	40	0	0.00 %	2	5.00 %	0	0.00 %
323	40	0	0.00 %	2	5.00 %	0	0.00 %
330	40	0	0.00 %	2	5.00 %	0	0.00 %
332	40	0	0.00 %	2	5.00 %	0	0.00 %
350	40	0	0.00 %	2	5.00 %	0	0.00 %
380	40	0	0.00 %	8	20.00 %	0	0.00 %
All Others	40	0	0.00 %	0	0.00 %	0	0.00 %
Total Errors			0		66[a]		0
Error Rate			0.00 %		0.43 %[b]		0.00 %

Source: RRB OIG Analysis of 385 samples and CIGIE FAEC's *Testing Results Spreadsheet* tool.
[a] Total errors of 66 = Sum of column E.
[b] Error rate of 0.43 = Sum of column F divided by 385.

Conclusion

Based on the sample of 385 records, we determined the RRB's overall projected error rates for completeness, accuracy, and timeliness were 0.00 percent, 0.43 percent, and 0.00 percent, respectively.

The highest error rate was 0.43 percent, which is considered a quality of Higher since it was between 0 percent and 20 percent as shown in Table 7. Therefore, the RRB's data was determined to be of **Higher** quality.

APPENDIX IV: RRB'S RESULTS FOR THE DATA ELEMENTS

Table 10 summarizes the results of our data element testing. We sorted the results by error rate in order to provide the stakeholders with easy to discern information regarding which data elements were determined to have the highest instances of error. Table 10 is based on the results of our testing of 384 financial assistance records and 1 procurement record submitted in RRB's first quarter of fiscal year 2019 DATA Act submission. Since the RRB did not have a DQP at the time of submission, we were unable to determine whether these risks were consistent with the risks identified in its applicable DQP.

Table 10.   RRB's Results for Data Elements

		Completeness (C), Accuracy (A), and Timeliness (T)				
				Error Rate[a]		
Data Element Number	Errors Found in File	Data Element Name	#	C %	A %	T %
6	D2	Legal Entity Congressional District	10	0.00	2.60	0.00
31	D2	Primary Place of Performance Congressional District	10	0.00	2.60	0.00
34	C/D2	Award ID Number (PIID/FAIN/URI)	10	0.00	2.60	0.00
5	D1/D2	Legal Entity Address	6	0.00	1.56	0.00
26	D1/D2	Period of Performance Start Date	6	0.00	1.56	0.00
1	D2	Awardee/Recipient Legal Entity Name	5	0.00	1.30	0.00
27	D2	Period of Performance Current End Date	5	0.00	1.30	0.00
35	D2	Record Type	5	0.00	1.30	0.00
36	D2	Action Type	5	0.00	1.30	0.00
16	D1	Award Type	1	0.00	0.26	0.00
29	D1	Ordering Period End Date	1	0.00	0.26	0.00
30	D1	Primary Place of Performance Address	1	0.00	0.26	0.00
51	C	Appropriations Account	1	0.00	0.26	0.00
2	n/a	Awardee/Recipient Unique Identifier	0	0.00	0.00	0.00
3	n/a	Ultimate Parent Unique Identifier	0	0.00	0.00	0.00
4	n/a	Ultimate Parent Legal Entity Name	0	0.00	0.00	0.00
7	n/a	Legal Entity Country Code	0	0.00	0.00	0.00
8	n/a	Legal Entity Country Name	0	0.00	0.00	0.00
11	n/a	Federal Action Obligation	0	0.00	0.00	0.00

Completeness (C), Accuracy (A), and Timeliness (T)

Data Element Number	Errors Found in File	Data Element Name	#	Error Rate[a] C %	A %	T %
12	n/a	Non-Federal Funding Amount	0	0.00	0.00	0.00
13	n/a	Amount of Award	0	0.00	0.00	0.00
14	n/a	Current Total Value of Award	0	0.00	0.00	0.00
15	n/a	Potential Total Value of Award	0	0.00	0.00	0.00
17	n/a	NAICS Code	0	0.00	0.00	0.00
18	n/a	NAICS Description	0	0.00	0.00	0.00
19	n/a	Catalog of Federal Domestic Assistance Number	0	0.00	0.00	0.00
20	n/a	Catalog of Federal Domestic Assistance Title	0	0.00	0.00	0.00
22	n/a	Award Description	0	0.00	0.00	0.00
23	n/a	Award Modification/Amendment Number	0	0.00	0.00	0.00
24	n/a	Parent Award ID Number	0	0.00	0.00	0.00
25	n/a	Action Date	0	0.00	0.00	0.00
28	n/a	Period of Performance Potential End Date	0	0.00	0.00	0.00
32	n/a	Primary Place of Performance Country Code	0	0.00	0.00	0.00
33	n/a	Primary Place of Performance Country Name	0	0.00	0.00	0.00
37	n/a	Business Types	0	0.00	0.00	0.00
38	n/a	Funding Agency Name	0	0.00	0.00	0.00
39	n/a	Funding Agency Code	0	0.00	0.00	0.00
40	n/a	Funding Sub Tier Agency Name	0	0.00	0.00	0.00
41	n/a	Funding Sub Tier Agency Code	0	0.00	0.00	0.00
42	n/a	Funding Office Name	0	0.00	0.00	0.00
43	n/a	Funding Office Code	0	0.00	0.00	0.00
44	n/a	Awarding Agency Name	0	0.00	0.00	0.00
45	n/a	Awarding Agency Code	0	0.00	0.00	0.00
46	n/a	Awarding Sub Tier Agency Name	0	0.00	0.00	0.00
47	n/a	Awarding Sub Tier Agency Code	0	0.00	0.00	0.00
48	n/a	Awarding Office Name	0	0.00	0.00	0.00
49	n/a	Awarding Office Code	0	0.00	0.00	0.00

Completeness (C), Accuracy (A), and Timeliness (T)

Data Element Number	Errors Found in File	Data Element Name	Error Rate[a]			
			#	C %	A %	T %
50	n/a	Object Class	0	0.00	0.00	0.00
53	n/a	Obligation	0	0.00	0.00	0.00
54	n/a	Unobligated Balance	0	0.00	0.00	0.00
56	n/a	Program Activity	0	0.00	0.00	0.00
57	n/a	Outlay	0	0.00	0.00	0.00
9	n/a	Not Tested – Highly Compensated Officer Name[b]	--	--	--	--
10	n/a	Not Tested – Highly Compensated Officer Total Compensation[b]	--	--	--	--
21	n/a	Not Tested – Treasury Account Symbol[c]	--	--	--	--
52	n/a	Not Tested – Budget Authority Appropriated[d]	--	--	--	--
55	n/a	Not Tested – Other Budgetary Resources[d]	--	--	--	--

Source: RRB OIG Analysis – Sampling of Files C, D1, and D2.
[a] All estimates from the sample have a margin of error no greater than plus or minus 5 percentage points.
[b] We did not test DE 9 and DE 10 because they are reported in Files E and F and not in Files C, D1, or D2.
[c] We did not test DE 21 because it was included in DE 51 testing.
[d] We did not test DE 52 and DE 55 because they are reported in File A and not Files C, D1 or D2.

APPENDIX V: BASIC VALIDATION RULES FOR AGGREGATE AND NON-AGGREGATE REPORTING

Note: Blanks in the following picture indicate the element is optional.

Element	Max Length	Required for Aggregates (RecordType = 1)	Required for non-Aggregates (RecordType = 2)	Required for non-Aggregates (PII-redacted) (RecordType = 3)
ActionType	1		Y	Y
ActionDate	8	Y	Y	Y
AssistanceType	2	Y	Y	Y
RecordType	1	Y	Y	Y
FAIN	30		Y	Y
AwardModificationAmendmentNumber	25			
URI	70	Y		
CorrectionDeleteIndicator	1			
SAI_Number	50			
AwardeeOrRecipientLegalEntityName	120	Y, must be "MULTIPLE RECIPIENTS"	Y	Y, must be "REDACTED DUE TO PII"
AwardeeOrRecipientUniqueIdentifier	9	[Must be blank]	Y[2]	[Must be blank]
LegalEntityAddressLine1	150	[Must be blank]	Y	[Must be blank]
LegalEntityAddressLine2	150	[Must be blank]		[Must be blank]
LegalEntityZIP5	5	[Must be blank]	For Domestic Recipients	For Domestic Recipients
LegalEntityZIPLast4	4	[Must be blank]	For Domestic Recipients[3]	[Must be blank]
LegalEntityCongressionalDistrict	2	[Must be blank]	For Domestic Recipients when LegalEntityZIPLast4 is not provided	For Domestic Recipients
LegalEntityCountryCode	3	Y	Y	Y
LegalEntityForeignCityName	40		For Foreign Recipients	For Foreign Recipients
LegalEntityForeignProvinceName	25			
LegalEntityForeignPostalCode	50	[Must be blank]		
BusinessTypes	3	Y	Y	Y
FundingSubTierAgencyCode	4			
FundingOfficeCode	6	When ActionType = A and ActionDate >= 20181001	When ActionType = A and ActionDate >= 20181001	When ActionType = A and ActionDate >= 20181001
AwardingSubTierAgencyCode	4	When AwardingOfficeCode is not provided	When AwardingOfficeCode is not provided	When AwardingOfficeCode is not provided
AwardingOfficeCode	6	When ActionType = A and ActionDate >= 20181001	When ActionType = A and ActionDate >= 20181001	When ActionType = A and ActionDate >= 20181001
CFDA_Number	7	Y	Y	Y
PrimaryPlaceOfPerformanceCode	7	Y	Y	[Must be blank]
PrimaryPlaceOfPerformanceCountryCode	3	Y	Y	[Must be blank]
PrimaryPlaceOfPerformanceZIP+4	10		For Domestic Places Of Performance with Primary Place of Performance at a single zip code or city-wide	[Must be blank]
PrimaryPlaceOfPerformanceForeignLocationDescription	100	[Must be blank]	For Foreign Places of Performance	[Must be blank]
PrimaryPlaceOfPerformanceCongressionalDistrict	2	For Domestic Places Of Performance Y	For Domestic Places Of Performance when 9-digit PrimaryPlaceOfPerformanceZIP+4 not provided	[Must be blank]
AwardDescription	4000	Y	Y	Y
PeriodOfPerformanceStartDate	8			
PeriodOfPerformanceCurrentEndDate	8			
FederalActionObligation	20	For non-Loans	For non-Loans	For non-Loans
NonFederalFundingAmount	20			
FaceValueOfDirectLoanOrLoanGuarantee	20	For Loans	For Loans	For Loans
OriginalLoanSubsidyCost	20	For Loans	For Loans	For Loans
BusinessFundsIndicator	3	Y	Y	Y

Source: U.S. Dept. of Treasury, *DATA Act Information Model Schema (DAIMS) Practices and Procedures for DATA Act Broker Submissions Version 1.3*, (June 29, 2018)

APPENDIX VI: ANOMALY LETTER

Council of the Inspectors General on Integrity and Efficiency's DATA Act Anomaly Letter submitted to the Senate Committee on Homeland Security and Government Affairs and the House Committee on Oversight and Government Reform.

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