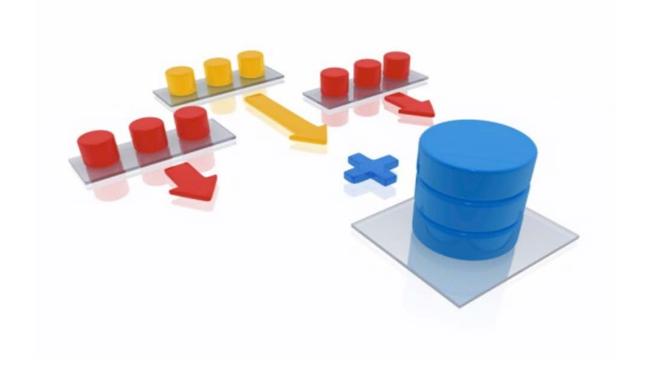


DATA Act Required Review Workshop





What We'll Talk About Today—

- Overview of the DATA Act
 - ✓ IG Oversight Requirements
 - ✓ Addressing the IG Date Anomaly
 - ✓ FAEC DATA Act Working Group
 - ✓ OMB/Treasury Issued Guidance
- Treasury/OMB Updates
- Required Review Guide Walkthrough
- Contracting DATA Act Oversight Engagements



DATA Act Overview

Digital Accountability and Transparency Act of 2014

➤ Expands Section 3 of the Federal Funding Accountability and Transparency Act (FFATA) of 2006 to increase accountability and transparency in Federal spending.

General Requirements:

- By May 2015 OMB/Treasury to issue Government-wide financial data standards
- By May 2017 Agencies to report financial data on USASpending.gov in accordance with OMB/Treasury established data standards
- ➤ By May 2018 OMB/Treasury to ensure that the established data standards are applied to the data reported on USASpending.gov



Oversight Requirements

Agency Inspectors General

- In consultation with GAO, review a statistically valid sampling of the spending data <u>submitted</u> by the Federal agency
- Submit to Congress and make publically available, a report assessing
 - completeness, accuracy, timeliness, and quality of the data sampled
 - implementation and use of Data Standards by the Federal agency
- 3 reviews due November 2016, November 2018, November 2020



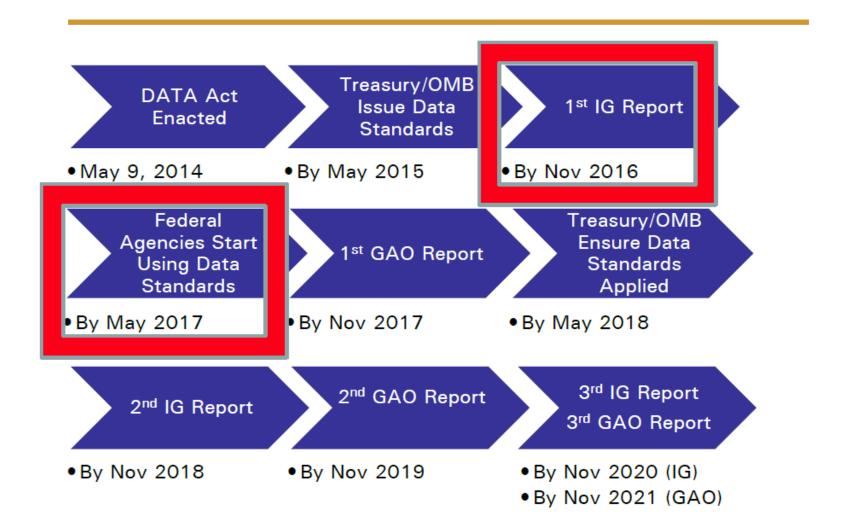
Oversight Requirements

Comptroller General Requirements

- Submit to Congress and make publically available, a report assessing and comparing
 - <u>completeness</u>, <u>accuracy</u>, <u>timeliness</u>, and <u>quality</u> of the data submitted to USASpending.gov (or a successor system) by Federal agencies
 - implementation and use of Data Standards by the Federal agencies
- 3 reviews due November 2017, November 2019, November 2021



Date Anomaly





FAEC DATA Act Working Group

Mission

Assist the IG Community in understanding and meeting its DATA Act oversight requirements by (1) serving as a working level liaison with Treasury, (2) consulting with the Government Accountability Office, (3) developing a common review approach and methodology, and (4) coordinating key communications with other stakeholders.

- ➤ Stood up January 2015
- > Over 140 members from 38 OlGs
- ➤ Established consultative protocol with GAO (e.g., meet monthly)
- Defined and communicated strategy for IG reporting anomaly



Anomaly and EFFICIENCY Addressing the IG Date Anomaly and Readiness Reviews

- > CIGIE Letter to Congress (December 22, 2015)
 - first agency IG report pushed back 1 year, to November 2017; subsequent reports to follow in November 2019 and November 2021
 - > encourage IGs to perform DATA Act "readiness reviews"



FAEC DATA Act Working Group

- Developed and updated the common methodology for performing "readiness reviews"
 - > 46 readiness reviews initiated to date
 - √ 36 readiness reviews issued
 - √ 10 readiness reviews to be issued
- Developed the common methodology for required reviews
- Next steps
 - ➤ Obtain feedback from the IG community and GAO on best practices/lessons learned from completing required reviews



Readiness Reviews Issued

OIGs of the Departments of				
Agriculture	Energy	the Interior – Interior Business Center (FSSP)	the Treasury	
Commerce	Health & Human Services	Justice		
Defense	Housing & Urban Development	Labor		
Education	the Interior	Transportation		



Readiness Reviews Issued

OIGs of Other Federal Agencies				
Appalachian Regional Commission	Export-Import Bank	Government Accountability Office	Office of Personnel Management	
Commodity Futures Trading Commission	Federal Deposit Insurance Corporation	U.S. International Trade Commission	Railroad Retirement Board	
Consumer Finance Protection Bureau	Federal Election Commission	National Credit Union Association	Security Exchange Commission	
Corporation for National and Community Service	Federal Labor Relations Authority	National Labor Relations Board	Small Business Administration	
Defense Nuclear Facilities Safety Board	Federal Maritime Commission	National Science Foundation	Social Security Administration	
Environmental Protection Agency	General Services Administration	Nuclear Regulatory Commission		



Inspectors General Readiness Reviews to be on integrity and efficiency Issued

OIGs of the Departments of				
Homeland Security	the Treasury – Treasury Inspector General for Tax Administration			
the Treasury – Administrative Resource Center (FSSP)	Department of Veteran Affairs			
OIGs of Other Federal Agencies				
Agency for International Development	Federal Trade Commission			
Denali Commission	Gulf Coast Ecosystem Restoration Council			
Federal Communication Commission	Millennium Challenge Corporation			



GAO's Capping Report of Readiness Reviews

- entrance conference held on January 17, 2017
- objectives/key questions:
 - What were the types and scope of readiness reviews issued by the OIG community as of January 31, 2017?
 - What did the OIGs report indicate about their agencies' efforts to meet the May 2017 reporting deadline?
 - 3. To what extent has OMB and Treasury used or plan to use the results of the OIG readiness reviews to assist in their monitoring of agencies implementation of the DATA Act?
- exit conference and briefing planned for March 28,
 2017 at the CIGIE Audit Committee meeting



GAO's Capping Report of Readiness Reviews

Agency OIG Readiness Review Reports GAO Obtained and Reviewed

CFO Act agencies	Non-CFO Act agencies	
Department of Defense	Appalachian Regional Commission	
Department of Education	Commodity Futures Trading Commission	
Department of Energy	Consumer Financial Protection Bureau	
Department of Health and Human	Defense Nuclear Facilities Safety Board	
Services		
Department of Housing and Urban	Export - Import Bank	
Development		
Department of the Interior	Federal Deposit Insurance Corporation	
Department of Justice	Federal Election Commission	
Department of Labor	Federal Labor Relations Authority	
Department of Transportation	Federal Maritime Commission	
Department of the Treasury	National Credit Union Administration	
Environmental Protection Agency	National Labor Relations Board	
General Services Administration	Railroad Retirement Board	
National Science Foundation	Securities & Exchange Commission	
Nuclear Regulatory Commission	U.S. International Trade Commission	
Small Business Administration		
Social Security Administration		



OMB M-15-12 issued May 8, 2015

- provides guidance to Federal agencies on current reporting requirements pursuant to the DATA Act
- > also requires agencies to develop DATA Act implementation plans

Requirements for Agency Implementation Plans

- identify a Senior Accountable Official (SAO)
- > estimate resource requirements
- propose an implementation timeline
- identify any foreseeable challenges and resolutions
- agencies that have Federal Shared Service Providers (FSSPs) should include anticipated costs and timelines necessary to implement this guidance
- For agencies moving to FSSPs, implementation plans should align with the move to a FSSP

Slide 15



DATA Act Implementation Playbook

Version 1.0 issued May 8, 2015 concurrently with OMB M-15-12 Version 2.0 issued June 24, 2016

- informational guidance to assist agencies with fulfilling the requirements of the DATA Act
 - describes eight key steps that, if followed together, should help agencies leverage existing capabilities to drive implementation of the DATA Act
 - ✓ each step includes a series of checklists that can be utilized by agencies as appropriate



DATA Act Implementation Playbook *version 2.0*, Agency 8-Step Plan

Steps for Agencies

1) Organize team

Create an agency DATA Act work group including impacted communities (e.g., CIO, Budget, Accounting, etc.) and identify Senior Accountable Official

2) Review elements

Review list of DATA Act elements and participate in data definitions standardization

3) Inventory data

Perform inventory of agency data and associated business processes

4) Design & strategize

Plan changes (e.g., adding Award IDs to financial systems) to systems and business processes to capture data that are complete multi-level (e.g., Summary and award detail) fully-linked data

5) Prepare Data for Submission to the Broker

Implement system changes and extract data (includes mapping of data from agency schema to the DATA Act Schema) iteratively

6) Test Broker implementation

Test Broker outputs to ensure data are valid iteratively

7) Update systems

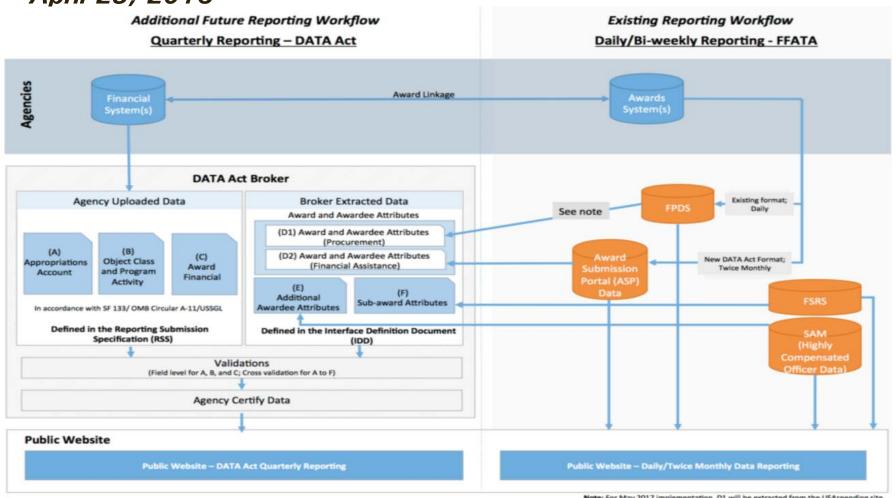
Implement other changes iteratively (e.g., establish linkages between program and financial data, capture any new data)

8) Submit data

Update and refine process (repeat 5-7 as needed)



DATA Act Information Model Schema (DAIMS) version 1.0 issued April 29, 2016





OMB Management Procedures Memo No. 2016-03 *issued May 3, 2016*

- provides additional guidance to Federal agencies on reporting requirements pursuant to the DATA Act including:
 - > new federal prime award reporting requirements
 - ✓ Award ID linkage by January 1, 2017
 - > quarterly SAO certification requirement
 - ✓ SAO assurance over data submitted to USASpending.gov
 - > authoritative sources for reporting pursuant to FFATA



OMB Management Procedures Memo No. 2016-03, cont'd. Authoritative Sources for Reporting Pursuant to FFATA

Data	Authoritative Source	Action Required by Agency
Federal non-financial procurement awards	Federal Procurement Data System- Next Generation (FPDS-NG)	None
Appropriations account summary-level financial data	OMB SF-133	Data Matching with Authoritative Source
Object class	Section 83 of OMB Circular A-11	Data Matching with Authoritative Source
Program activity codes and names	President's Budget	Data Matching with Authoritative Source
Financial assistance awardees required to register in SAM	System for Award Management (SAM)	Data Matching with Authoritative Source
Subaward information	FFATA Subaward Reporting System (FSRS)	None
Executive compensation	SAM	None



Frequently Asked Questions (FAQs) issued May 18, 2016 via Max.gov

- provides information to assist agencies in determining whether they are required to comply with the DATA Act
 - ➤ any Federal agency ("Executive agency" as defined by 5 USC § 105) submitting data that OMB posts on its SF-133 Report on Budget Execution and Budgetary Resources is required to comply with the DATA Act, including the 24 Chief Financial Officer (CFO) Act agencies
 - ➢ includes Included a list of agencies and other entities that submitted
 OMB SF-133 reports for fiscal year (FY) 2016 1st quarter



Frequently Asked Questions (FAQs) issued May 18, 2016 via Max.gov, cont'd

- > 5 USC § 105 An Executive agency consists of:
 - > each Executive Department
 - > each Government Corporation
 - ➤ each Independent establishment in the executive branch (except the United States Postal Service or the Postal Regulatory Commission)
 - > the Government Accountability Office (GAO)



Frequently Asked Questions (FAQs) issued May 18, 2016 via Max.gov, cont'd

List of agencies that submitted OMB SF-133 reports for FY 2016 1st quarter

Summary Status of GTAS Si Reporting Period: Summary Status of GTAS 5 Reporting Perio

Summary Status of GTAS Reporting Peri

Agency

Legislative Branch

Judicial Branch

Department of Agriculture

Department of Commerce

Department of Defense--Military Programs Department of Education

Department of Energy

Department of Health and Human Services

Department of Homeland Security

Department of Housing and Urban Development

Department of the Interior Department of Justice

Department of Labor

Department of State

Department of Transportation

Department of the Treasury

Department of Veterans Affairs

Corps of Engineers--Civil Works

Other Defense Civil Programs

Environmental Protection Agency Executive Office of the President

General Services Administration

International Assistance Programs

National Aeronautics and Space Administration

National Science Foundation Office of Personnel Management

Small Business Administration

Social Security Administration

Access Board

Administrative Conference of the United States

Advisory Council on Historic Preservation

Appalachian Regional Commission

Barry Goldwater Scholarship and Excellence in Education Foundati

Broadcasting Board of Governors

Bureau of Consumer Financial Protection

Central Intelligence Agency

Chemical Safety and Hazard Investigation Board

Christopher Columbus Fellowship Foundation Commission of Fine Arts

Commission on Civil Rights

Committee for Purchase from People Who Are Blind or Severely Dis Commodity Futures Trading Commission

Page 1 of 3

Consumer Product Safety Commission

Corporation for National and Community Service

Corporation for Public Broadcasting

Corporation for Travel Promotion

Council of the Inspectors General on Integrity and Efficiency

Court Services and Offender Supervision Agency for the District

Defense Nuclear Facilities Safety Board

Delta Regional Authority

Denali Commission District of Columbia

Election Assistance Commission

Equal Employment Opportunity Commission

Export-Import Bank of the United States

Farm Credit Administration

Farm Credit System Insurance Corporation

Federal Communications Commission

Federal Deposit Insurance Corporation

Federal Drug Control Programs

Federal Election Commission

Federal Financial Institutions Examination Council Federal Housing Finance Agency

Federal Labor Relations Authority

Federal Maritime Commission

Federal Mediation and Conciliation Service

Federal Mine Safety and Health Review Commission

Federal Trade Commission

Gulf Coast Ecosystem Restoration Council

Harry S Truman Scholarship Foundation

Indian Law and Order Commission

Institute of American Indian and Alaska Native Culture and Arts

Institute of Museum and Library Services

Intelligence Community Management Account

International Trade Commission

James Madison Memorial Fellowship Foundation

Japan-United States Friendship Commission

Legal Services Corporation

Marine Mammal Commission

Merit Systems Protection Board

Military Compensation and Retirement Modernization Commission

Morris K. Udall and Stewart L. Udall Foundation

National Archives and Records Administration

National Capital Planning Commission

National Council on Disability

National Credit Union Administration

National Endowment for the Arts

National Endowment for the Humanities

National Labor Relations Board

National Mediation Board

National Railroad Passenger Corporation Office of Inspector Gene National Transportation Safety Board

Neighborhood Reinvestment Corporation

Northern Border Regional Commission

Nuclear Regulatory Commission

Nuclear Waste Technical Review Board

Occupational Safety and Health Review Commission

Office of Government Ethics

Office of Navajo and Hopi Indian Relocation

Office of Special Counsel Office of the Fed Coordinator for Alaska Natural Gas Transportat

Other Commissions and Boards

Patient-Centered Outcomes Research Trust Fund

Postal Service

Presidio Trust Privacy and Civil Liberties Oversight Board

Public Defender Service for the District of Columbia

Railroad Retirement Board

Recovery Accountability and Transparency Board

Securities and Exchange Commission Smithsonian Institution

State Justice Institute

Surface Transportation Board

Tennessee Valley Authority

United States Court of Appeals for Veterans Claims

United States Enrichment Comporation Fund

United States Holocaust Memorial Museum

United States Institute of Peace

United States Interagency Council on Homelessness

Vietnam Education Foundation United States Railway Association

Government-wide Totals

Executive Branch Agency Totals

Page 3 of 3 Page 2 of 3



OMB M-17-04 issued November 4, 2016

- provides additional guidance to Federal agencies to support the technical operationalization of reporting to USASpending.gov in accordance with the DATA Act, and in furtherance of Federal spending transparency specifies:
 - reporting financial information involving intragovernmental transfers (IGTs) (including allocation transfers and buy/sell transactions)
 - reporting financial assistance awards containing personal identifiable information (PII)
 - quarterly SAO assurance over DATA Act data (including a list of assurances for each DATA Act file submitted)



GAO-10-365: ELECTRONIC GOVERNMENT:

Implementation of the FFATA of 2006; (March 2010)

Objectives - To determine if:

- OMB is complying with FFATA requirements to make Federal award data available
- > Federal agencies are reporting required award data
- Inconsistencies exist between the data on USASpending.gov and records of Federal agencies



GAO-10-365, cont'd

GAO's Sampling Methodology, in part:

- obtained data from OMB on FY 2008 awards reported to USASpending.gov
- selected a random sample of 100 Federal awards, which included 50 contracts and 50 grants, loans, and other Federal awards
 - due to the small sample size, GAO could not reliably estimate the extent of compliance in the entire population



GAO-10-365, cont'd

Results – GAO found, in part:

widespread inconsistencies between data on USASpending.gov for the awards reviewed and the records provided by awarding agencies



GAO-14-476: DATA TRANSPARENCY: Oversight Needed to Address Underreporting and Inconsistencies on Federal Award Website (June 2014)

Objectives – To determine the extent to which:

- agencies report required award data
- the data on USASpending.gov are consistent with agency records



GAO-14-476, cont'd

GAO Sampling Methodology, in part:

- > selected a simple random sample of 385 FY 2012 award records using a
 - \triangleright sample precision of +/-5%, and
 - > confidence level of 95%
- ➤ for the 21 data elements required by FFATA, compared the information reported on USASpending.gov to information contained in the originating agency's underlying records, where available



GAO-14-476, cont'd

Results – GAO found, in part:

- significant underreporting of awards and few awards that contained information fully consistent with the agencies' records
- agencies did not properly report information on assistance awards (e.g., grants or loans), totaling approximately \$619 billion in FY 2012



GAO-14-476, cont'd

Results – GAO found, in part:

- while OMB placed additional responsibilities on agencies to ensure their reported information was accurate, GAO's testing of the 2012 awards shows that this approach had limited effect on the overall quality of the data
- issues initially identified in 2010, such as unclear award titles and inaccurate information on place of performance, continued to limit the reliability of USASpending.gov data



OIG-16-023: DATA ACT: USASpending.gov Refreshed, But Data Quality Issues Remain (December 22, 2015)

Treasury OIG's (TOIG) objective was to:

review actions taken by the Bureau of the Fiscal Service (Fiscal Service) to stand up a Government-wide financial management transparency office and to meet its programmatic responsibilities for USASpending.gov



OIG-16-023, cont'd

Results – TOIG found, in part:

- Fiscal Service's USASpending.gov Enhancement Project did not address identified concerns with the quality of the data presented on USASpending.gov
 - in December 2014, Treasury's Fiscal Assistant Secretary testified that agencies will address long-standing data quality issues through DATA Act implementation



Managing the Challenge & Complexity of the DATA Act

Common mistakes to avoid for a successful Required Review:

- 1. Not Being Directly Involved with the Project
- 2. Not Adequately Selling the Problem
- 3. Inconsistent Messaging/Poor Communication
- 4. Not Providing Adequate Resources
- 5. Shifting Focus or Changing Priorities too Soon
- 6. Ignoring Organizational Culture
- 7. Ignoring or Underestimating Impact on Employees



Treasury/OMB Updates

Christina Ho

Deputy Fiscal Assistant Secretary for Accounting Policy

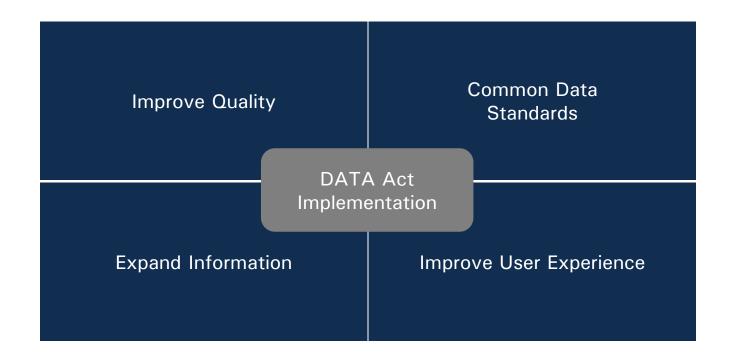
Karen Lee

OMB Branch Chief for Management Controls and Assistance Branch



What is the DATA Act?

The DATA Act establishes government-wide financial data standards and increases the availability, accuracy, and usefulness of federal spending information.







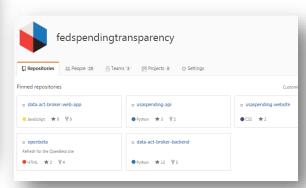
Our Approach



Agile DevelopmentDevelop using an iterative process



User-Centric Design
Develop a user-centric
website to make the
data accessible



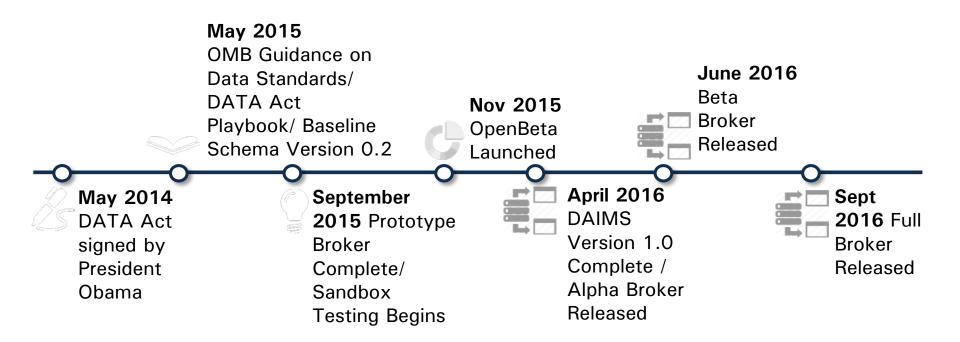
Leverage open source to make the work of transparency ...

Transparency





Where We've Been





INTEGRITY and EFFICIENCY DATA Act Information Model Schema (DAIMS)

- ➤ The DATA Act Schema provides a standardized definition and conceptual model for the information relevant to the domain and public reporting of U.S. Federal spending.
- >The Schema informs:
 - How data providers select and organize information to submit
 - What information is collected, processed, and how it is related
 - How consumers can access and interpret information



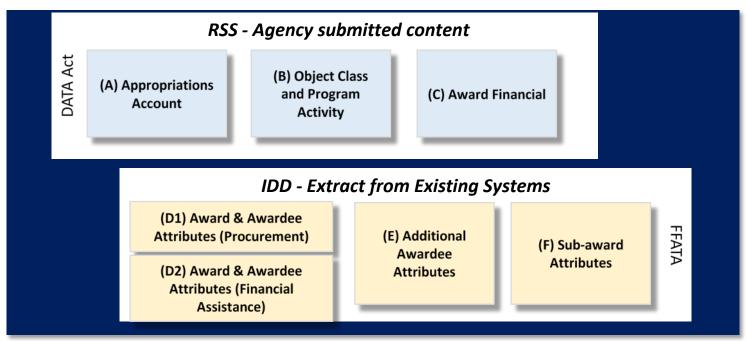
DATA Act Schema Components

- ➤ Reporting Submission Specification (RSS) includes a listing of the data elements with specific instructions for federal agencies to submit content in the appropriate format.
- ➤Interface Definition Document (IDD) contains a listing of the elements, with supporting metadata to understand what data will be pulled from government-wide systems and from agency financial assistance systems.
- ➤ Information Flow provides an overview of the reporting timeframes and sources of the data.
- ➤ DAIMS Diagrams visual representations of how the data elements from the RSS and IDD fit together in context.
- ➤ Online Data Dictionary a comprehensive list of data elements with definitions and minimal metadata, like definition and data category.
- ➤ XBRL Schema Files machine-readable version of the data standard that includes accounting-related and award-related content.

Slide 40



DATA Act Schema Components

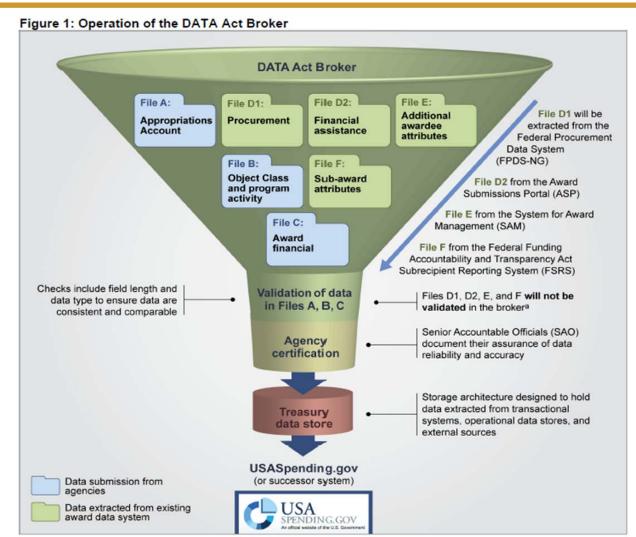


- File A through F are aligned to the DATA Act objectives
 - File A appropriation summary level data aligned to the SF133 reporting
 - File B obligation and outlay information at program activity and object class level
 - ➤ File C obligations at the award and object class level
 - File D1 and D2 award and awardee details that are linked to File C
 - ➤ File E additional prime awardee attribute.
 - File F sub-award information





Reporting Process Flow



Welcome to the DATA Act Broker

Upload your agency's files and validate them against the latest version of the DATA Act Information Model Schema

Details on how to format your data, including required and optional fields, can be found in the Reporting Submission Specification (RSS) v1.0.





Ready to upload and validate your agency's files?

Great, we'll be happy to walk you through the process.*

Upload & Validate a New Submission

What you will need to submit



Did you start a submission but were unable to complete it? No problem, we can help you pick up where you left off.

Continue or Certify a Saved Submission



Generate your D1 and D2 award files without having to create a submission.

Generate D Files



Where We're Going



Agencies review errors generated by the Broker and update source systems

May 2017
Publish DATA Act
data on
USAspending.gov



Agencies test data in the DATA Act Broker



April 2017
Agencies
submit/certify
first DATA Act
submission



Participate!

- Comment on the designs
 openbeta.usaspending.gov
- Visit our GitHub site to read about our process
 fedspendingtransparency.github.io/
- See the work we are doing github.com/fedspendingtransparency





Questions?



Thanks!

Contact Us: DATAPMO@fiscal.treasury.gov





DATA Act Required Review Guide Walkthrough



Inspectors General Guide to Compliance Under the DATA Act



§ 120 – Objectives

The objectives of this engagement are to assess the:

- completeness, accuracy, timeliness, and quality of FY 2017, second quarter financial and award data submitted for publication on USASpending.gov
- Federal agency's <u>implementation</u> and <u>use</u> of Government-wide financial data standards established by OMB and Treasury



Completeness, Accuracy, Timeliness, and Quality are defined as follows_(§ 110.02):

> Completeness

- → all transactions that should have been recorded are recorded in the proper period GAO-08-585G, GAO Financial Audit Manual, (July 25, 2008)
- percentage of transactions containing all applicable data elements required by the DATA Act OMB Open Government Directive – Federal Spending Transparency (April 6, 2010)

Accuracy

➤ percentage of transactions that are complete and do not have inconsistencies with the systems of record or other authoritative sources OMB Open Government Directive – Federal Spending Transparency (April 6, 2010)



Definitions, cont'd.

- > Timeliness
 - Percentage of transactions reported within 30 days of quarter end OMB Open Government Directive Federal Spending Transparency (April 6, 2010)
- Quality Encompasses utility, objectivity, and integrity:
 - Utility the usefulness of the data to the intended users
 - Objectivity focuses on whether the disseminated data are being presented in an accurate, clear, complete, and unbiased manner, and as matter of substance, is accurate, reliable, and unbiased
 - ► Integrity the protection of data from unauthorized access or revision, to ensure that the data are not compromised through corruption or falsification OMB's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies (February 22, 2002)



8-Step Agency Implementation Plan (Step 2)

2) Review elements

Review list of DATA Act elements and participate in data definitions standardization

Suggested Criteria

- DATA Act Implementation Playbook 8-Step Agency Implementation Plan
- Federal Spending Transparency Data Standards

Risks

- ➤ The Agency (or applicable FSSP) did not [review] understand the DATA Act elements
- ➤ The Agency may not correctly assess the impact of reporting the data element on its implementation plans or systems.
- ➤ The Agency may not consider current USAspending.gov data elements as required by FFATA.



§ 130 - Scope and Methodology

- > Type of Engagement to be performed:
 - ➤ an <u>attestation examination</u> or a <u>performance audit</u> in accordance with the requirements of GAGAS as described in Chapter 5 (attestation examinations) or Chapters 6 and 7 (performance audits)

Scope Period:

> FY 2017, second quarter financial and award data the Federal agency submitted for publication on USASpending.gov



§ 130 - Scope and Methodology, cont'd

- > To accomplish the objectives, the engagement team should:
 - obtain an understanding of any regulatory criteria to report financial and award data under the DATA Act;
 - assess its agency's systems, processes, and internal controls in place over data management under the DATA Act;
 - assess the general and application controls pertaining to the financial management systems from which the data elements were derived and linked;
 - assess its agency's internal controls in place over the financial and award data reported to USASpending.gov per OMB Circular A-123;



§ 130 - Scope and Methodology, cont'd

- > To accomplish the objectives, the engagement team should:
 - review a statistically valid sample from FY 2017, second quarter financial and award data submitted for publication on USASpending.gov;
 - > assess the <u>completeness</u>, <u>accuracy</u>, <u>timeliness</u>, and <u>quality</u> of the financial and award data sampled; and
 - > assess its agency's implementation and use of the 57 data definition standards established by OMB and Treasury.



§ 200 – Planning

- The engagement team should:
 - > leverage the understanding of readiness reviews performed, while keeping in mind implementation efforts may have evolved
 - gain an understanding of applicable laws, legislation, directives, and any other guidance to reporting financial and award data under the DATA Act
 - gain an understanding of the agency's financial and award information and environment
 - roles, responsibilities, and reporting relationships of its agency, major reporting components and/or bureaus, and FSSPs



§ 200 – Planning, cont'd

- > The engagement team should gain an understanding of:
 - > the agency's source systems for all financial and award data reported under the DATA Act
 - > the impact of sensitive or classified information on these source systems
 - > controls over these source systems, the nature and extent of control testing performed over the source systems, and the results of that testing
 - > processes, systems, and controls the agency has in place to manage and report financial and award data under the DATA Act



§ 300 - Assessment of Internal Controls

Management, <u>not</u> the engagement team, is responsible for the design, implementation, and operating effectiveness of the agency's internal controls.

> The engagement team should:

- perform an assessment of internal controls to determine the nature, timing, and extent of testing
 - > consult GAO's Standards for Internal Control in the Federal Government (Green Book)
- identify and document agency-specific control objectives and its agency's risks and related controls to mitigate those risks using a control matrix



§ 300 - Assessment of Internal Controls, cont'd

Example of Control Objectives Matrix

Control Objectives	Potential Risks	Controls Identified
Internal controls over data management to ensure the integrity and quality of the data.	Agency financial system(s) does not have all awards/transactions for the reporting quarter.	
	Data reported does not accurately reflect its authoritative source.	
	Data submission does not reconcile to the agency's source system(s).	
Internal controls over data reporting to ensure that the data reported are complete, accurate, timely, and of quality.	All awards/transactions for the reporting quarter have not been reported.	,
	All required transactions are not included in the DATA Act Submission.	
	Transactions were not reported within 30 days of quarter end.	
	Data reported does not accurately reflect its authoritative source.	
	Data reported are not objective and useful, and lack integrity.	
	5000 00	



§ 310 - Assessment of Internal Controls Over Agency Source Systems

- > The engagement team:
 - should assess whether the internal controls over the agency financial and award systems are properly designed, implemented, and operating effectively
 - > should determine the extent to which these systems can be relied on as authoritative sources for reported information in accordance with the DATA Act
 - > may rely on internal control and substantive testing performed by other auditors related to its agency depending on the nature of the work performed (e.g. financial statement audits)



§ 310 - Assessment of Internal Controls Over Agency Source Systems, cont'd

- For all financial and award data source systems, the engagement team should:
 - determine the extent of internal control testing
 - performed by management; and
 - > completed on information systems controls, general and application, over financial management systems relevant to DATA Act reporting
 - identify any control deficiencies or weaknesses and assess the impact of these deficiencies on data reported under the DATA Act
 - state a conclusion on the design, implementation, and operating effectiveness of the internal controls over financial and award data derived from these source systems
 Slide 61



§ 310 - Assessment of Internal Controls Over Agency Source Systems, cont'd

- ➤ When determining its reliance on source systems, engagement teams of CFO Act agencies should consider:
 - ➤ the agency annual statement on whether its systems of internal accounting and administrative controls comply with the requirements of the Federal Managers Financial Integrity Act (FMFIA)
 - > its agency's financial management systems' compliance with the Federal Financial Management Improvement Act (FFMIA)



§ 310 - Assessment of Internal Controls Over Agency Source Systems, cont'd

Use the following to determine the level of substantive testing (defined in § 400) required by the engagement team of individual attributes in the agency's DATA Act submission

Internal control was	Findings	Reliance
Sufficient in scope	No significant deficiencies, material vveaknesses, and/or substantive errors	Reliable
	Significant deficiencies, material weaknesses, and/or substantive errors corrected	Use Professional Judgment
		Use Professional Judgment
Insufficient in scope or non-existent	N/A	Not Reliable



- > The engagement team should:
 - ➤ evaluate the design, implementation, and operating effectiveness of the processes, systems, and controls that the agency used to extract data reported under the DATA Act
 - ➤ determine and document whether the design, implementation, and operating effectiveness of the processes, systems, and controls in place over data management and reporting reasonably assures that
 - > the Government-wide financial data standards are followed
 - ➤ data reported are complete, accurate, timely, of quality, and in sufficient detail



- > The engagement team should:
 - ➤ determine whether the design, implementation, and operating effectiveness of the processes, systems, and controls in place over the data management process reasonably assures that
 - ✓ the agency maintains clear documentation of the steps it performed to report data under the DATA Act
 - ✓ data quality challenges are identified and remediated
 - ✓ procedures to reconcile data, resolve discrepancies, and periodically verify source data are clearly defined and followed



- > The engagement team should:
 - ➤ determine whether the design, implementation, and operating effectiveness of the processes, systems, and controls in place over data reporting reasonably assures that data reported under the DATA Act comply with the
 - ✓ DAIMS
 - ✓ OMB M-17-04
 - ✓ OMB MPM 2016-03
 - ✓ OMB M-15-12



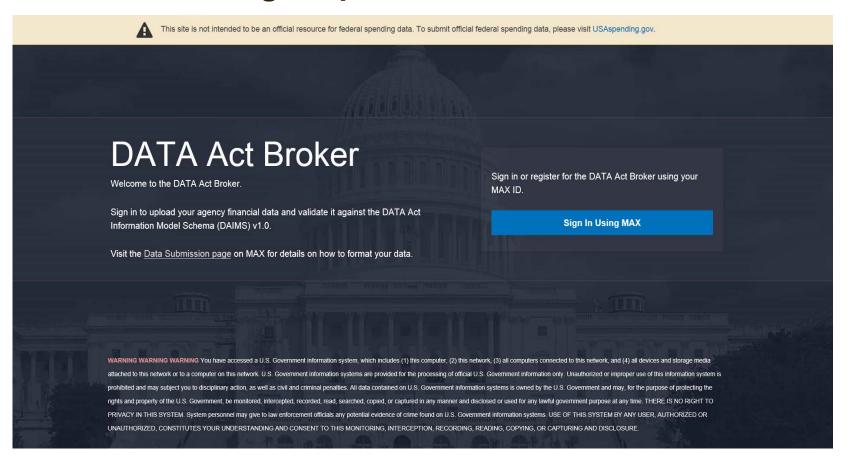
- > The engagement team should:
 - Determine whether the SAO, or a designee, has provided quarterly assurance that its agency's internal controls support the <u>reliability</u> and <u>validity</u> of the agency's summary level and award-level reported data (OMB's MPM-2016-03 and M-17-04)
 - obtain, from the SAO, its agency's certification, validation, reconciliation reports, and any other relevant supporting documentation used in providing their quarterly assurance
 - ✓ determine whether its agency's system(s), processes, and controls are sufficient to allow the SAO to provide their quarterly assurance



- > The engagement team should:
 - review the agency's process for reconciling and validating its DATA Act submission
 - ✓ review its agency's supporting documentation to determine whether it
 identifies any deficiencies in internal control or other limitations that
 would prevent the SAO from certifying the data submission



§ 400 - Test of Agency's DATA ACT Submission





§ 400 - Test of Agency's DATA ACT Submission, cont'd

- The engagement team should obtain:
 - read-only access, from its agency, for Treasury's DATA Act Broker submission portal (https://broker.USASpending.gov/)
 - > FY 2017, second quarter data submission for Files A through F
 - final matching/validation report
 - > its agency's SAO assurance over quarterly data submission to USASpending.gov



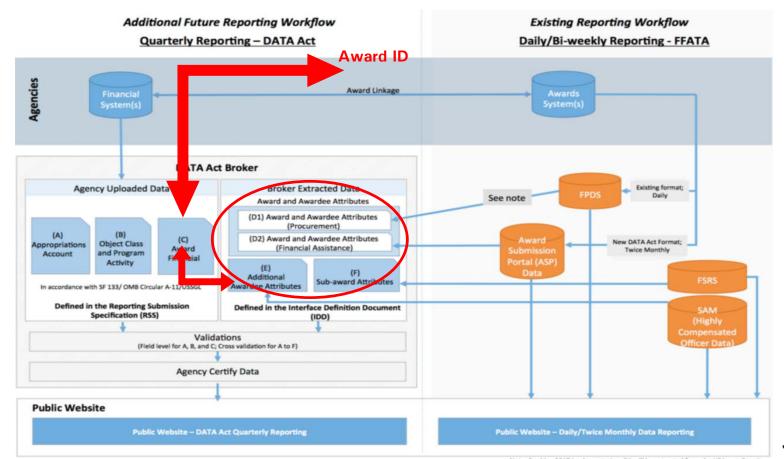
§ 400 - Test of Agency's DATA ACT Submission, cont'd

- ➤ In testing the SAO's reconciliation and processes for correcting errors or omissions of quarterly data submissions, determine whether:
 - the data submission met the requirements for <u>completeness</u>, <u>accuracy</u>, <u>timeliness</u>, and <u>quality</u>
 - the data submission reflects all appropriations and outlays recorded on the agency's quarterly SF-133, except Loan Financing Accounts (LFAs)
 - Files A and B totals agree



§ 400 - Test of Agency's DATA ACT Submission, cont'd

In testing the SAO's reconciliation and processes for correcting errors or omissions of quarterly data submissions, determine whether:





- The engagement team should:
 - ➤ compare File A to the information contained in OMB's SF-133 to determine if all summary-level transactions are included for the reporting period
 - ✓ as part of this comparison, assess the agency's efforts to reconcile the data from the SF-133 to the Statement of Budgetary Resources (SBR)



Obtaining your agency's SF-133

- 1. Go to https://max.omb.gov/maxportal/document/SF133/Budget/FACTS%20II%20-%20SF%20133%20Report%20on%20Budget%20Execution%20and%20Budgetary%20Resources.html
- 2. Select FY 2017

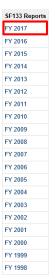
MAX Information and Reports (Executive, Legislative, and Judicial Users): SF 133 Report on Budget Execution and Budgetary Resources.html

This page last changed on Dec 20, 2016

The SF 133 Report on Budget Execution and Budgetary Resources.html fulfills the requirement in 31 U.S.C. 1511 - 1514 that the President review Federal expenditures at least four times a year. SF 133s provide historical reference that can be used to help prepare the President's Budget, program operating plans, and spend-out rate estimates. For further information on the SF 133 see OMB Circular No. A-11

Agencies submit the data that appear on these reports to the Department of the Treasury Financial Management Service. While OMB publishes these reports as a service to agency budget and finance offices and other interested parties, the underlying data is submitted by the agencies.

Reports since 1998 are shown below.





Obtaining your agency's SF-133

3. Select your agency's Quarterly Reports

MAX Information and Reports (Executive, Legislative, and Judicial Users): FY 2017 - SF 133 Reports on Budget Execution and Budgetary Resources

This page last changed on Jan 23, 2017

FY 2017 SF 133s for Legislative Branch, Judicial Branch, each cabinet department, each major independent agency, and all other independent agencies appear below

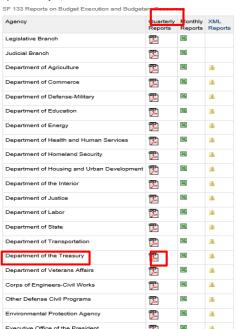
As has been the practice for many years, the quarterly submissions appear in a PDF file. The SF 133s for the monthly reporting periods are in Excel files

Agencies are required to submit SF 133s only for unexpired TAFSs during the monthly reporting periods; they may, however, at their option submit SF 133s for expired TAFSs, as well

Notes

- In FY 2017, OMB will produce monthly reports in November, July and August in addition to the quarterly reporting. The Fiscal 2017 Reporting Window Schedule is posted here http://fms.treas.gov/gtas/reporting_schedule.htm

Updated January 23, 2017





Obtaining your agency's SF-133 – Example of SF-133

28:56 F	6 РМ		OFFICE OF MANAGEMENT AND BUDGET FY 2016: GTAS Cross Walk to the SF 133 (Dollars)			Page 85 of 894	
	Agency:	Department of the Treasury	•				
udget F	Bureau:	Departmental Offices					
_	Account:	Office of Inspector General					
-	y Account:	Office of Inspector General					
_	Account ID:		ry Account ID: 2016 /17 -0106				
GTAS U	ser:	202-622-1169 / Brian.McCor	nkey@do.treas.gov				
Line No	Line Description	on	Q1 Amount	Q2 Amount	Q3 Amount	Q4 Amount	
1121 E	BA: Disc: Appro	s transferred from other accounts opriation (total)	0.00 0.0 0	2,800,000.00 2,800,000.00	2,800,000.00 2,800,000.00	2,800,000.00 2,800,000.00	
1900 E	Budget authority	y total (disc. and mand.)	0.00	2,800,000.00	2,800,000.00	2,800,000.00	
1910 7	Fotal budgetary	resources (disc. and mand.)	0.00	2,800,000.00	2,800,000.00	2,800,000.00	
2002 7	Total Budgetary R		0.00	659,292.83	1,006,439.73	1,826,524.50	
2002 1	Total Budgetary R Total Budgetary R	Resources Resources	0.00	0.00	-2.92	48,678.27	
2002 T 2004 E	Total Budgetary R Total Budgetary R Direct obligation	Resources Resources as (total)	0.00 0.00	0.00 659,292.83		48,678.27 1,875,202.77	
2002 T 2004 E	Total Budgetary R Total Budgetary R Direct obligation	Resources Resources	0.00	0.00	-2.92	48,678.27	
2002 T 2002 T 2004 E 2170 N	Total Budgetary R Total Budgetary R Direct obligation New obligations,	Resources Resources as (total)	0.00 0.00	0.00 659,292.83	-2.92 1,006,436.81	48,678.27 1,875,202.77	
2002 T 2002 T 2004 E 2170 M	Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations	Resources Resources is (total) , unexpired accounts	0.00 0.00 0.00	0.00 659,292.83 0.00	-2.92 1,006,436.81 0.00	48,678.27 1,875,202.77 1,875,202.77	
2002 T 2002 T 2004 E 2170 N 2190 N	Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti	Resources Resources Is (total) I, unexpired accounts I and upward adjustments (total)	0.00 0.00 0.00 0.00	0.00 659,292.83 0.00 659,292.83	-2.92 1,006,436.81 0.00 1,006,436.81	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77	
2002 T 2002 T 2004 E 2170 M 2190 M 2201 U 2412 U	Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti	Resources Resources Ins (total) In unexpired accounts In unexpired adjustments (total) In unexpired adjustments (total) In unexpired adjustment period In u	0.00 0.00 0.00 0.00 0.00	0.00 659,292.83 0.00 659,292.83 2,140,707.17	-2.92 1,006,436.81 0.00 1,006,436.81 1,793,563.19	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77 924,797.23	
2002 1 2002 1 2004 [2170 N 2190 N 2201 U 2412 U 2490 U	Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti Unexpired Unobl	Resources Resources Ins (total) In unexpired accounts In unexpired adjustments (total) Identify the second of the	0.00 0.00 0.00 0.00 0.00 0.00	0.00 659,292.83 0.00 659,292.83 2,140,707.17 2,140,707.17	-2.92 1,006,436.81 0.00 1,006,436.81 1,793,563.19 1,793,563.19	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77 924,797.23 924,797.23	
2002 T 2002 T 2004 C 2170 N 2190 N 2201 U 2412 U 2490 U	Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti Unexpired Unob Unob Bal: end of	Resources Resources Ins (total) In unexpired accounts In unexpired adjustments (total) Identify the second of the	0.00 0.00 0.00 0.00 0.00 0.00	0.00 659,292.83 0.00 659,292.83 2,140,707.17 2,140,707.17 2,140,707.17	-2.92 1,006,436.81 0.00 1,006,436.81 1,793,563.19 1,793,563.19 1,793,563.19	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77 1,875,202.77 924,797.23 924,797.23	
2002 T 2004 E 2170 N 2190 N 2201 U 2412 U 2490 U 2500 T	Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti Unexpired Unob Unob Bal: end of Total budgetary Memo: Bud resc.	Resources Resources It (total) It unexpired accounts It and upward adjustments (total) It ioned, unexp: Avail current period It id gated Balance: end of year If year (total) It resources	0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 659,292.83 0.00 659,292.83 2,140,707.17 2,140,707.17 2,140,707.17 2,800,000.00	-2.92 1,006,436.81 0.00 1,006,436.81 1,793,563.19 1,793,563.19 1,793,563.19 2,800,000.00	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77 1,875,202.77 924,797.23 924,797.23 924,797.23 2,800,000.00	
2002 T 2002 T 2004 E 2170 N 2190 N 2201 L 2412 L 2490 L 2500 T 2501 N 2503 N	Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti Unexpired Unob Unob Bal: end of Total budgetary Memo: Bud resc.	Resources Resources Ins (total) In unexpired accounts In and upward adjustments (total) Identify the second of the	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.00 659,292.83 0.00 659,292.83 2,140,707.17 2,140,707.17 2,140,707.17 2,800,000.00	-2.92 1,006,436.81 0.00 1,006,436.81 1,793,563.19 1,793,563.19 2,800,000.00 2,800,000.00	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77 1,875,202.77 924,797.23 924,797.23 924,797.23 2,800,000.00 2,800,000.00	
2002 1 2002 1 2004 E 2170 M 2190 M 2201 U 2412 U 2490 U 2500 1 2501 M 2503 M Change	Total Budgetary R Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti Unexpired Unobl Unob Bal: end of Total budgetary Memo: Bud resc, Memo: Bud resc, e in Obl Bal	Resources Resources Ins (total) In unexpired accounts In and upward adjustments (total) Identify the second of the	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.00 659,292.83 0.00 659,292.83 2,140,707.17 2,140,707.17 2,140,707.17 2,800,000.00	-2.92 1,006,436.81 0.00 1,006,436.81 1,793,563.19 1,793,563.19 2,800,000.00 2,800,000.00	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77 1,875,202.77 924,797.23 924,797.23 924,797.23 2,800,000.00 2,800,000.00	
2002 1 2002 1 2004 E 2170 M 2190 M 2201 U 2412 U 2500 1 2501 M 2503 M Change 3010 C	Total Budgetary R Total Budgetary R Total Budgetary R Direct obligation New obligations, New obligations Unob Bal: Apporti Unexpired Unobl Unob Bal: end of Total budgetary Memo: Bud resc, Memo: Bud resc, e in Obl Bal	Resources Resources It (total) It is and upward adjustments (total) Resources Resource	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.00 659,292.83 0.00 659,292.83 2,140,707.17 2,140,707.17 2,140,707.17 2,800,000.00 2,800,000.00	-2.92 1,006,436.81 0.00 1,006,436.81 1,793,563.19 1,793,563.19 2,800,000.00 2,800,000.00 1,793,563.19	48,678.27 1,875,202.77 1,875,202.77 1,875,202.77 924,797.23 924,797.23 924,797.23 2,800,000.00 2,800,000.00 924,797.23	



- The engagement team should:
 - ➤ determine whether File A includes all Treasury Account Symbols
 (TAS) from which funds are obligated, by selecting all summary-level
 transactions from File A and matching the following elements to the
 agency's SF-133:
 - 1. agency identifier
 - 2. main account code
 - 3. sub account code
 - 4. budget authority appropriated amount
 - 5. budget authority available amount
 - 6. gross outlay amount by TAS
 - 7. unobligated balance

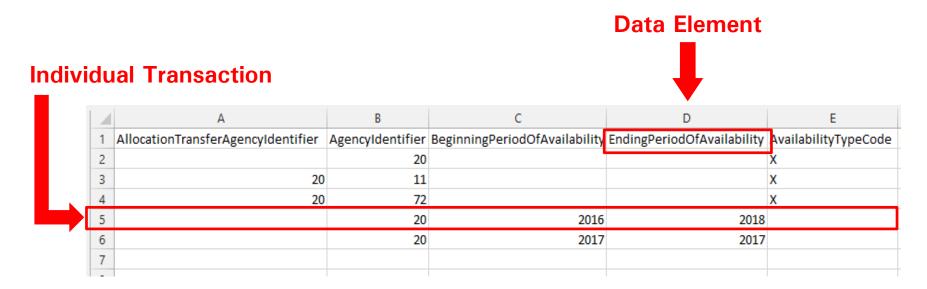


Sample Submission File A



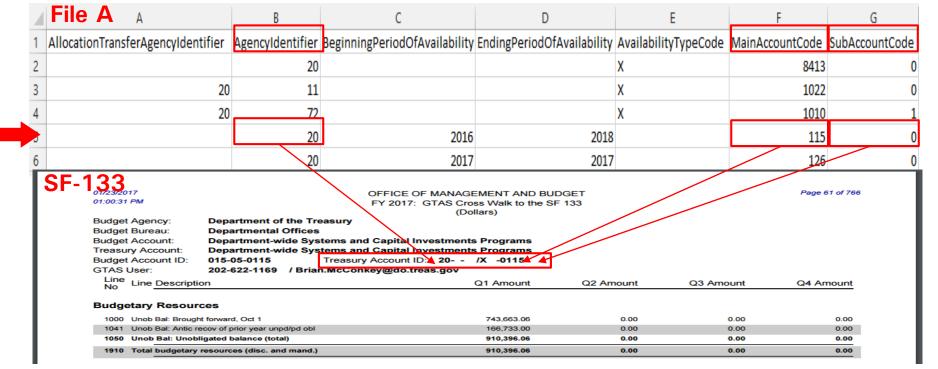


Understanding a Submission File





- → determine whether File A includes all Treasury Account Symbols (TAS) from which funds are obligated, by selecting all summary-level transactions from File A and matching the following elements to the agency's SF-133:
 - 1. agency identifier 2. main account code 3. sub account code





§ 410 - Test Summary-Level Data (Files A and B), cont'd

The engagement team should:

- ➢ determine whether File A includes all Treasury Account Symbols (TAS) from which funds are obligated, by selecting all summary-level transactions from File A and matching the following elements to the agency's SF-133:
 - 4. budget authority appropriated amount
 - 5. budget authority available amount
 - 6. gross outlay amount by TAS
 - 7. unobligated balance



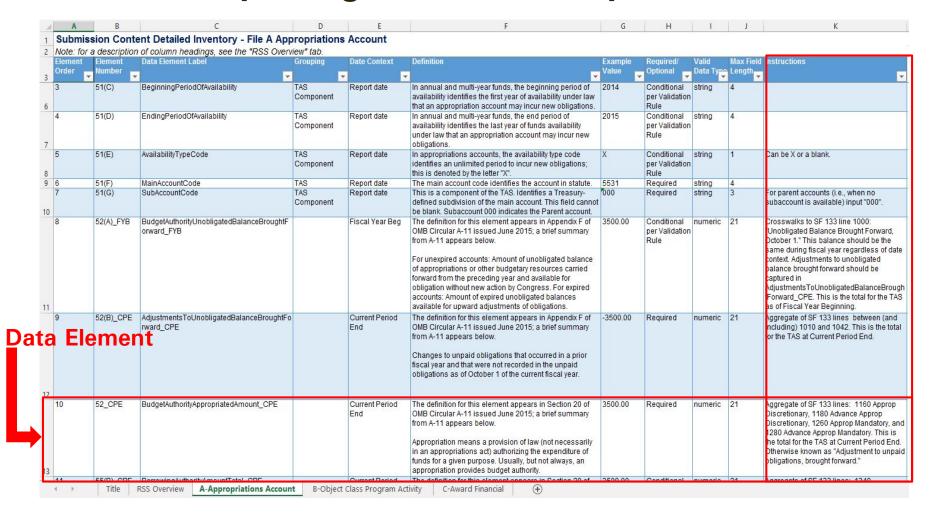
DAIMS Reporting Submission Specification (RSS)



RSS

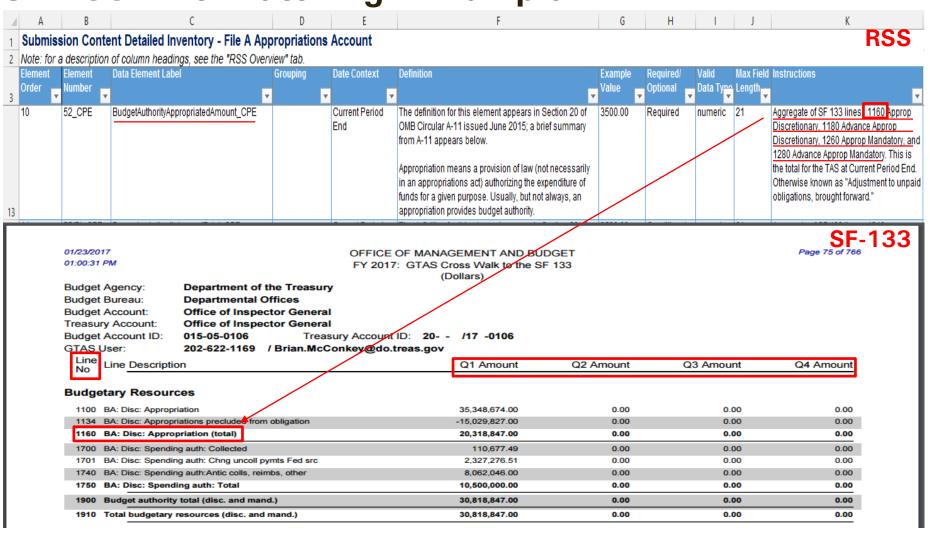


DAIMS Reporting Submission Specification (RSS)





SF-133 Line Matching - Example





SF-133 Line Matching – Per the RSS

Data Element	Match to SF-133 Line(s):
Budget authority appropriated amount	1160 + 1180 + 1260 1280
Budget authority available amount	1910
Gross outlay amount by TAS	3020
Unobligated balance	2490



SF-133 Matching – Potential Variances

- > a File A transaction is not found in the SF-133
- ➤ the amount reported by File A's transaction data element identified for matching to the SF-133 does not match the amount reported by the corresponding SF-133 line
 - ✓ File A's transaction data element amount indicates a zero yet the corresponding line number in the SF-133 is reported
 - ✓ Files A's transaction data element amount and corresponding SF-133 line amount are not the same

Any variances found during the SF-133 matching process should be clearly documented by the Federal agency. The engagement team should assess the reasonableness of the agency's process to resolve all variances and report on any unusual or unexplained variances it identifies.

Slide 86



- The engagement team should:
 - ➢ if File A is complete, compare the data in File B to File A to determine whether all appropriations found in the SF-133 are accounted for in File B
 - 1.confirm that File B includes all TASs by matching the main account codes and sub account codes to records found in File A
 - 2. verify that the totals of File A and B equal



Sample Submission File B



File B



§ 410 - Test Summary-Level Data (Files A and B), cont'd

1.confirm that File B includes all TASs by matching the main account codes and sub account codes to records found in File A

ile B	В	C	D	E	F	G	Н
AllocationTransferAgencyIdentifier	Agencyldentifier Be	eginningPeriodOfAvailability E	ndingPeriodOfAvailability	AvailabilityTypeCode	MainAccountCode S	ubAccountCode	ProgramActivityName
	20			X	8413	0	Assessment Funds
20	11			X	1022	0	International Narcotics Control and Law Enforcement
20	72			X	1010	1	Assistance for Eastern Europe and the Baltic States
	20	2016	2018		115	0	Department-Wide Systems and Capital Investments Program
	20	2017	2017		126	0	GSE Mortgage-Backed Securities Purchase Program
ile A	В	C	D	E	E	Ğ	Н
AllocationTransferAgencyIdentifier	Agencyldentifier B	BeginningPeriodOfAvailability	EndingPeriodOfAvailabilit	y AvailabilityTypeCod	MainAccountCode	SubAccountCo	de BudgetAuthorityUnobligatedBalanceBroughtForward_FY
	20			X	8413	- 111 - 111	0 38373.5
20	11			X	1022		0
20	72			X	1010		1
	20	2016	2018	3	115		0
	20	2017	2017	7	126		0 24505552.77



§ 410 - Test Summary-Level Data (Files A and B), cont'd

2. verify that the totals of File A and B equal

e B	-			
	G	AJ	AK	AL
nAccountCode Si	ubAccountCode	GrossOutlayAmountByProgramObjectClass_FYB	GrossOutlayAmountByProgramObjectClass CPE	ObligationsIncurredByProgramObjectClass CPE
8413	0	0	0	-1000
1022	0	0	0	-49997.06
1010	1	0	-575057.68	-1139461.49
115	0	0	-257810.55	-100000
126	0	0	-3958310.99	-8684214.28
		Totals	-4791179.22	-9974672.83
1	8413 1022 1010 115	8413 0 1022 0 1010 1 115 0	8413 0 0 1022 0 0 1010 1 0 115 0 0 126 0 0	8413 0 0 0 1022 0 0 0 1010 1 0 -575057.68 115 0 0 -257810.55 126 0 0 -3958310.99

File A

4	F	G	0	Р	Q
1	MainAccountCode	SubAccountCode	BudgetAuthorityAvailableAmountTotal_CPE	GrossOutlayAmountByTAS_CPE	ObligationsIncurredTotalByTAS_CPE
2	8413	0	63180.3	0	1000
3	1022	0	7500000	0	49997.06
4	1010	1	1154916	-575057.68	1139461.49
5	115	0	12136000	-257810.55	100000
6	126	0	1025805553	-3958310.99	8684214.28
7			Totals	-4791179.22	9974672.83
4					



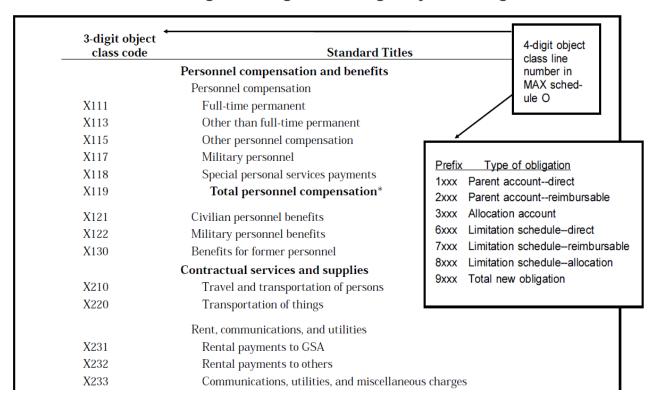
- The engagement team should:
 - verify that all program activity names, codes, and object classes from File B, match the codes defined in Sections 83 and 200 of OMB Circular A 11 and the Program & Financing Schedule in the President's Budget
 - √ verify that all program activity names, codes, and object classes in the agency's SF-133 submission are accounted for in File B
 - request the appropriations account summary-level report based on Object Class Codes for the related cumulative FY 2017 data and reconcile this report to File B



A-11 Object Class Codes, Standard Titles and Definitions

OBJECT CLASSIFICATION
EXHIBIT 83A (MAX SCHEDULE O)

Releasing Contingent Emergency Funding





Sample of Budget Object Class Listing in FY 2017 410000 GRANTS, SUBSIDIES AND CONTRIBUTIONS

Grants, Subsidies, gratuities, and other aid for which cash payments are made to States, other political subdivisions, corporations, associations, and individuals.

41.0 Grants, Subsidies and Contributions - Nothing should be coded to this category.

410001 Grants

410002 Subsidies

410003 Training and Technical Assistance

410004 Recoverable Grants

410005 Grant Audit Payments



- For summary-level data that contain an IGT, the engagement team should:
 - determine if the transfer is an allocation transfer or a buy/sell transaction
 - review OMB's M-17-04 for additional guidance:
 - ✓ the awarding agency will continue to report award-level information (Files D1 and D2) under FFATA and the Federal Acquisition Regulation
 - ✓ reporting financial information (Files A-C) depends on the type of IGT being reported



- ➤ To assess the <u>completeness</u> of Files A and B and <u>proper use</u> of data standards:
 - evaluate whether all summary-level financial data in Files A and B that should have been reported was reported for the reporting period;
 - evaluate whether the summary-level financial data in Files A and B contain all applicable standardized data elements;
 - ➤ determine whether each of the required data elements is present and in conformance with the corresponding established Government-wide financial data standard; and



- ➤ To assess the <u>completeness</u> of Files A and B and <u>proper use</u> of data standards:
 - > evaluate the agency's process to review the 57 data standards and associated definitions established by OMB and Treasury.
 - > assess the agency's efforts to communicate and resolve all data definition concerns/issues with OMB and Treasury.



- > To assess timeliness for Files A and B:
 - determine whether transactions were reported within 30 days of quarter end



- > To assess the quality of the summary level financial data
 - refer to § 320 of the Guide (Assessment of Internal Controls Over the DATA Act Submission) while keeping the results of the testing for completeness, timeliness, and accuracy in mind



- > Any variances found during the testing of summary-level data should be clearly documented by the Federal agency.
- The engagement team should assess the reasonableness of the agency's process to resolve all variances and report on any unusual or unexplained variances it identifies.



§ 420 - Determine whether File C is complete and suitable for sampling

File C, for FY 2017, second quarter will only include obligation amounts for each award made and/or modified during that reporting quarter (January 1, 2017 – March 31, 2017)

- ➤ To determine if File C is suitable for sampling, the engagement team should:
 - assess the agency's reconciliation process between the data in Files B and C; and



- § 420 Determine whether File C is complete and suitable for sampling, cont'd
- > To determine if File C is suitable for sampling, the engagement team should:
 - > assess the agency's process to determine which Object Classes (from File B) contain reportable award-level information.

If File C is not suitable for sampling, the engagement team should derive its sample from Files D1 and D2.



- § 420 Determine whether File C is complete and suitable for sampling, cont'd
- > Assess the agency's methodology for ensuring that File C contains all linked transactions that it should, and only those transactions:
 - > assess the sufficiency of the agency's method of determining File C's completeness based on the agency's explanation of:
 - √ how it ensures File C is complete
 - √ how it ensures that transactions not required under the DATA Act, but
 use the same Object Class as DATA Act transactions, are not in File C



§ 430 - Select a Statistically Valid, Random Sample of Certified Spending Data Submitted

- > The engagement team should:
 - randomly select a statistically valid sample of certified spending data from the reportable award-level transactions included in the agency's certified File C submission, or Files D1 and D2 if File C is unavailable
 - > test the linkages from File C to Files D1 through F



§ 430 - Select a Statistically Valid, Random Sample of Certified Spending Data Submitted, cont'd

- > To select a statistically valid sample, the engagement team should use the following criteria:
 - ➤ Population Size the number of detail award transactions included in the agency's quarterly certified data submission determined by adding the total number of detail award transactions in File C, or Files D1 and D2 if File C is unavailable
 - Confidence level the percentage of all possible samples that can be expected to include the true population parameter
 - Expected error rate the estimated number of errors in the population to be sampled
 - Sample Precision the expected difference between the true population parameter and a sample estimate of that parameter
 - Sample Size the number of transactions to be selected for the IG's review to ensure consistency



§ 430 - Select a Statistically Valid, Random Sample of Certified Spending Data Submitted, cont'd

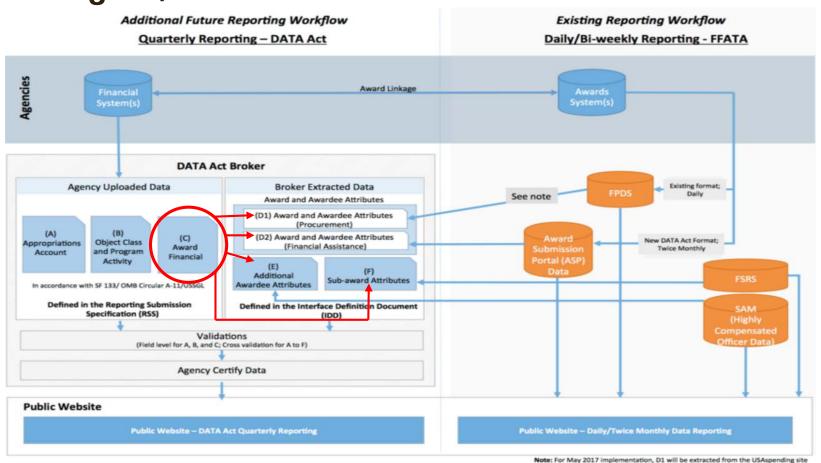
Criteria to select a statistically valid sample – Parameters:

Criteria	Parameter
Confidence Level	95%
Expected Error Rate	50% (initial year)
Sample Precision	+ /- 5%
Sample Size	385 transactions*

^{*} For agencies with a smaller population, where the recommended sample size of 385 represents 5% or more of the population, the sample size may be reduced by applying the finite correction factor using the following formula to determine the recommended sample size: 385/[1 + (385/N)], where "N" represents the population size.

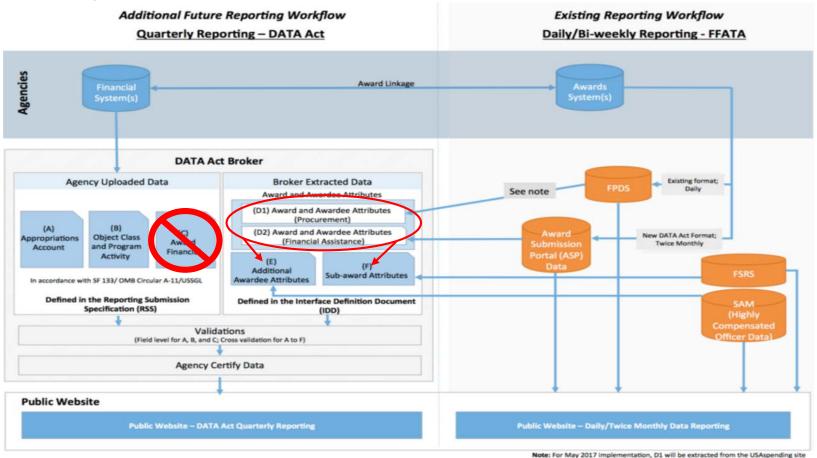


§ 440 - Detail Test – Award Level Linkages (Files C through F)





§ 440 - Detail Test – Award Level Linkages (Files C through F), cont'd





§ 440 - Detail Test – Award Level Linkages (Files C through F), cont'd

- > Any variances found during the detail testing of award level linkages should be clearly documented by the Federal agency.
- > The engagement team should assess the reasonableness of the agency's process to resolve all variances and report on any unusual or unexplained variances it identifies.



§ 450 - Detail Test - Award-Level Transaction Data

- ➤ To assess the <u>completeness</u> of the award-level transaction data and proper use of data standards:
 - evaluate whether all transactions and awards, made and/or modified after January 1, 2017 have been recorded and reported in the proper period
 - evaluate whether each transaction sampled contain all required data elements
 - determine whether each required data element is presented in conformance with the corresponding established data standard
 - evaluate the agency's process to review the 57 data standards and associated definitions and efforts to communicate and resolve related issues with OMB and Treasury



- § 450 Detail Test Award-Level Transaction Data, cont'd
- > To assess the accuracy of the award-level transaction sample data:

For each transaction containing:	Match the information to:
Award-level data	Agency's financial systems' or underlying accounting records
Non-financial procurement award data elements	Agency's financial systems' or underlying accounting records
Financial procurement award data elements	Agency's financial systems' or underlying accounting records
Award-level data for awardees	SAM
Sub-award data	FSRS
Executive compensation data	SAM
Official entity information	Agency's financial systems' or underlying accounting records



- § 450 Detail Test Award-Level Transaction Data, cont'd
- > To assess the timeliness of the award-level transaction sample data:
 - evaluate whether financial and non-financial assistance award-level data transactions and procurement award data were reported within 30 days after the quarter in which they are made and/or amended



- § 450 Detail Test Award-Level Transaction Data, cont'd
- > To assess the quality of the award-level transaction sample data:
 - refer to the internal control assessment in section 320 and the results of testing performed under sections 440 and 450



§ 450 - Detail Test - Award-Level Transaction Data, cont'd

- > Any variances found during the detail testing of award-level transaction data should be clearly documented by the Federal agency.
- The engagement team should assess the reasonableness of the agency's process to resolve all variances and report on any unusual or unexplained variances it identifies.



§ 460 - Results

- The engagement team should report the:
 - <u>error rate</u> and <u>sampling error</u> (margin of error) for each characteristic tested (<u>completeness</u>, <u>accuracy</u>, <u>timeliness</u>, <u>quality</u> of the data submitted for publication on USASpending.gov and the agency's <u>implementation</u> and <u>use</u> of the Government-wide financial data standards



§ 500 - Reporting

Required review reports should conform to GAGAS standards and contain the results of the engagement team's assessment of:

- > internal controls over source systems used to report financial and award data for publication on USASpending.gov
- > internal controls in place over data management and processes used to report financial and award data to USASpending.gov
- ➤ identified control deficiencies that may adversely impact the completeness, timeliness, quality, and accuracy of the data submitted



§ 500 - Reporting, cont'd

Required review reports should conform to GAGAS standards and contain the results of the engagement team's assessment of the:

- completeness, timeliness, quality, and accuracy of the data sampled by the Federal agency IG
- implementation and use of the Government-wide financial data standards by the Federal agency

Deficiencies in internal control that are not significant to the objectives of the engagement but warrant the attention of those charged with governance, should be included in the report or otherwise communicated in writing to its agency's management officials.



§ 500 - Reporting, cont'd

- > Initial DATA Act Required Review Reports should be:
 - > made publicly available by November 8, 2017
 - distributed to the following:
 - ✓ Senate Committee on Homeland Security and Governmental Affairs
 - ✓ House Committee on Oversight and Government Reform
 - ✓ Senate Committee on the Budget
 - ✓ House Committee on the Budget
 - ✓ GAO
 - √ Treasury OIG



Contracting DATA Act Oversight Engagements



Contracting DATA ACT Oversight Engagements

- What to include in the SOW or PWS
- Can the Required Engagement be attached to an awarded Financial Statement Audit contract?
 - Depends on how the contract has been awarded
 - Also, depends on the opinion of the CO according to expected dollar value
 - Working with your CO and assigning the appropriate COR
 - Timeline of contracting process
- Difference between DATA Act Engagement vs. the Readiness Review
- Questions?



Questions can be sent to DATAAct@oig.treas.gov