



U.S. Office of Personnel Management
Office of the Inspector General
Office of Audits

Final Audit Report

**Audit of the U.S. Office of Personnel Management's
Data Submission and Compliance with the
Digital Accountability and Transparency Act of 2014**

Report Number 4A-CF-00-20-044
November 8, 2021

Executive Summary

Audit of the U.S. Office of Personnel Management's Data Submission and Compliance with the Digital Accountability and Transparency Act of 2014

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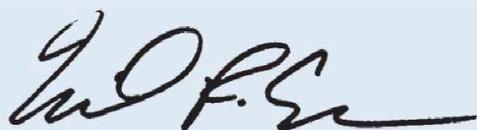
November 8, 2021

Why Did We Conduct the Audit?

The objectives of our audit were to assess (1) the completeness, accuracy, timeliness, and quality of fiscal year (FY) 2020, fourth quarter, financial and award data submitted for publication on USAspending.gov and (2) the U.S. Office of Personnel Management's (OPM) implementation and use of the Government-wide financial data standards established by the U.S. Office of Management and Budget (OMB) and the U.S. Department of the Treasury (Treasury).

What Did We Audit?

The Office of the Inspector General completed a performance audit of OPM's Digital Accountability and Transparency Act of 2014 (DATA Act) process and submission for FY 2020, fourth quarter. Our audit was conducted virtually from February 19 through August 30, 2021.



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What Did We Find?

1. DATA Act Reporting Requirements

We evaluated OPM's DATA Act process and submission and determined that:

- OPM has implemented and is using the Government-wide financial data standards for award and spending information as defined by OMB and Treasury.
- OPM's DATA Act submission, of Files A, B and C, to the Treasury's DATA Act Broker was complete and submitted timely, with no data limitation disclosures.
- OPM scored a quality* score rating of 73 out of 100 points, which is a quality rating of **Moderate** (See Table 2: U.S. Office of Personnel Management Quality Scorecard on page 17), as defined by the Council of the Inspectors General on Integrity and Efficiency Federal Audit Executive Council December 2020 compliance guide.

2. Linkage Discrepancies Between Files C and D1

We identified one area where OPM needs to strengthen controls over its DATA Act submission process to ensure that no discrepancies exist in the linkages between Files C and D1. While we generally found that the required elements were present in data files A, B and C, and all 23 Coronavirus Disease 2019 (COVID-19) outlays tested were properly reported in File C, we found that 113 out of the 150 non-COVID-19 transactions tested were identified in File C (award financial) and not in File D1 (award procurement).

*Quality represents data that is complete, accurate, and reported on a timely basis.

Abbreviations

CBIS	Consolidated Business Information System
CIGIE	Council of the Inspector General on Integrity and Efficiency
COVID-19	Coronavirus Disease 2019
DAIMS	DATA Act Information Model Schema
DAIW	The DATA Act Implementation Working Group
DATA Act	Digital Accountability and Transparency Act of 2014
DQP	Data Quality Plan
FAEC	Federal Audit Executive Council
FAIN	Federal Award Identification Number
FFATA	Federal Funding Accountability and Transparency Act of 2006
FPDS-NG	Federal Procurement Data System-Next Generation
FY	Fiscal Year
IAE	Integrated Award Environment
IDD	Interface Definition Document
IG	Inspector General
IT	Information Technology
OCFO	Office of the Chief Financial Officer
OIG	Office of the Inspector General
OMB	U.S. Office of Management and Budget
OPM	U. S. Office of Personnel Management
OPO	Office of Procurement Operation
PIID	Procurement Instrument Identifier
PRISM	Procurement Information System for Management
RSS	Reporting Submission Specification
SAM	System for Award Management
SAO	Senior Accountable Official
Treasury	U.S. Department of the Treasury

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Report Fraud, Waste, and Mismanagement

I. Background

This final audit report details the findings, conclusions, and recommendations resulting from our performance audit of the U.S. Office of Personnel Management's (OPM) Data Submission and Compliance with the Digital Accountability and Transparency Act of 2014 (DATA Act). The audit was performed by OPM's Office of the Inspector General (OIG), as authorized by the Inspector General Act of 1978, as amended.

The DATA Act was enacted on May 9, 2014¹, to expand the reporting requirements pursuant to the Federal Funding Accountability and Transparency Act of 2006 (FFATA)². The DATA Act requires Federal agencies to report financial and award data in accordance with established Government-wide financial data standards. In May 2015, the U.S. Office of Management and Budget (OMB) and the U.S. Department of the Treasury (Treasury) published 57³ data definition standards (referred to as data elements) and required Federal agencies to report financial and award data in accordance with these standards for DATA Act reporting, beginning in January 2017. Beginning in May 2017, in accordance with the DATA Act, Treasury began displaying Federal agencies' data on USAspending.gov so that taxpayers and policy makers could review and use the information.

OMB issued the following guidance to Federal agencies to ensure reporting requirements are met:

- OMB Memorandum M-10-06, *Open Government Directive*, dated December 8, 2009, directs executive departments and agencies to take specific actions to implement the principles of transparency, participation, and collaboration. Within 45 days of issuance of this memorandum, agencies shall identify and publish online in an open format at least three high-value data sets and register those data sets via Data.gov. Furthermore, agencies shall designate a high-level senior official to be accountable for the quality and objectivity of, and internal controls over, the Federal spending information in USAspending.gov. Within 60 days, each agency shall create an open government webpage to function as the gateway for agency activities.
- OMB's guidance in *Open Government Directive - Federal Spending Transparency*, dated April 6, 2010, focuses on three areas:
 - Implementation of a policy to require the collection and reporting on sub-award data. Under this guidance, sub-award information will now be required to be collected and reported.

¹ Public Law 113-101 (May 9, 2014)

² Public Law 109-282 (September 26, 2006)

³ Under FFATA, Federal agencies report 259 data elements to USAspending.gov. However, Treasury and OMB identified 49 existing elements, deemed controversial in nature, and 8 new data elements requiring standardization.

- Improvement of Federal agencies' timeliness, completeness, and accuracy of Federal spending information⁴. Quarterly data metrics will be displayed publicly on the Federal government's spending website, USAspending.gov.
 - Enhancement of the technological capabilities of USAspending.gov, by OMB, for users to view and analyze Federal spending data.
- OMB Memorandum M-15-12, *Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable*, issued May 8, 2015, provides guidance to Federal agencies on current reporting requirements pursuant to the FFATA, as amended by the DATA Act and requires agencies to develop DATA Act implementation plans. In addition, the DATA Act Implementation Playbook (Version 1.0) was issued concurrently with OMB M-15-12 as informational guidance to assist agencies with fulfilling the requirements of the DATA Act. Treasury's DATA Act Implementation Playbook (Version 2.0) was issued in June 2016.
 - OMB Management Procedures Memorandum 2016-03, *Additional Guidance for DATA Act Implementation: Data-Centric Approach for Reporting Federal Spending Information*, dated May 3, 2016, states that the authoritative source for entity information of Financial Assistance Awardees remains agency systems validated against the System for Award Management (SAM) for awardees required to register in SAM. The authoritative source for sub-award information remains the FFATA⁵ Sub-award Reporting System. Data will continue to flow directly from the FFATA Sub-award Reporting System to USAspending.gov with no additional actions required of agencies.
 - OMB Memorandum M-17-04, *Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability*, dated November 4, 2016, further specifies:
 - responsibilities for reporting financial information for awards involving Intragovernmental Transfers,
 - guidance for reporting financial assistance award records containing Personally Identifiable Information, and
 - guidance for agencies to provide the Senior Accountable Official (SAO) assurance over quarterly submissions to USAspending.gov. Agencies are

⁴ Generally, timeliness is the percentage of transactions reported within 30 days, completeness is the percentage of transactions containing all data elements required by the Transparency Act, and accuracy is the percentage of complete transactions that do not have inconsistencies with systems of record or other authoritative sources.

⁵ FFATA, Public Law No. 109-282, 31 U.S.C. § 6101, see footnote.

required to comply with the record keeping and reporting requirements for the first DATA Act reporting (May 2017) and for every quarter thereafter.

For all allocation transfer related data included in DATA Act Files A through C, the awarding agency must provide assurance of the accuracy and reliability of the data to the funding agency. The funding agency, in turn, will be responsible for assuring the submission of the information in Files A through C for display on USAspending.gov.

When a funding agency funds a service through an awarding agency, both the awarding and funding agency are responsible for submitting appropriations data and program activity, and object class data (Files A and B). In addition, the awarding agency will submit the financial award data (File C) and will continue to report award-level information (Files D1 and D2).

The agency's SAO assurance will be submitted quarterly through Treasury's DATA Act Broker⁶ process. The quarterly process will require the SAO to assure that alignment among Files A through F is valid and reliable and the data in each DATA Act file submitted for display on USAspending.gov is valid and reliable.

OMB Memorandum M-18-16, *Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk*, dated June 6, 2018, requires DATA Act reporting agencies to implement a Data Quality Plan (DQP) effective for fiscal years 2019 through 2021, at a minimum to achieve the objectives of the DATA Act. The DQP should cover significant milestones and major decisions pertaining to:

- The organizational structure and key processes providing internal controls for spending reporting.
- Management's responsibility to supply quality data to meet DATA Act reporting objectives 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.

The DATA Act requires the Inspector General (IG) of each Federal agency to review a statistically valid sample of the spending data submitted by its Federal agency and submit a

⁶ The DATA Act Broker enables Federal agencies to upload, validate, and certify quarterly financial data. Agencies can also test monthly financial data, generate award files, and view DATA Act submissions.

publicly available report to Congress assessing the completeness, timeliness, quality, and accuracy of the data sampled, and the implementation and use of the Government-wide financial data standards by the Federal agency. The DATA Act defines completeness, timeliness, quality, and accuracy in the following ways:

- **Completeness** - Defined in two ways: (1) agency submission - all transactions and events that should be recorded are recorded in the proper reporting period and (2) data elements - for each of the required data elements that should be reported, the data element was reported in the appropriate Files A through D2.
- **Timeliness** - Defined in two ways: (1) agency submission - reporting of the agency's DATA Act submission to the DATA Act Broker is in accordance with the schedule established by the Treasury DATA Act Project Management Office and (2) data elements - for each of the required data elements that should be reported to the DATA Act Broker, the data elements were reported in accordance with the reporting schedules defined by the financial, procurement and financial assistance requirements.
- **Accuracy** - Amounts and other data relating to recorded transactions are recorded in accordance with the DATA Act Information Model Schema (DAIMS), Reporting Submission Specification⁷ (RSS), Interface Definition Document⁸ (IDD), and the online data dictionary, and agree with the authoritative source records.
- **Quality** - Defined as data that is complete, accurate, and reported on a timely basis.

As written in the DATA Act, the first set of IG reports were due to Congress in November 2016. However, Federal agencies were not required to display spending data in compliance with the DATA Act until May 2017. To address this reporting anomaly, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) chair issued a letter, dated December 22, 2015, detailing the strategy for dealing with the IG 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. As a result, the IGs provided Congress with their first required reports by November 8, 2017, one year after the statutory due date, with two subsequent reports to be submitted following on a two-year cycle. This is the third and final report required under the DATA Act.

To meet the needs of the IG community, the CIGIE Federal Audit Executive Council (FAEC) established the DATA Act Working Group. In consultation with the U.S. Government Accountability Office, as required by the DATA Act, the FAEC DATA Act Working Group

⁷ The RSS provides detail on specific data that is submitted from an agency's financial system.

⁸ The IDD contains a listing of the elements, with supporting metadata, to understand which data will be pulled from government-wide systems for procurement and from agency's financial assistance systems.

developed the CIGIE FAEC Inspectors General Guide to Compliance under the DATA Act. The guide sets a baseline framework for the required reviews performed by the IG community and fosters a common methodology for performing these mandates. The guide is updated, as necessary, based on feedback from the IG community, U.S. Government Accountability Office, and other stakeholders. The most recent update to the CIGIE FAEC compliance guide was in December 2020.

In April 2020, OMB issued M-20-21, *Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19)*, which made changes to DATA Act reporting, including that:

- Agencies that accepted COVID-19 supplemental relief funding are required to submit DATA Act Files A, B, and C monthly, starting with the June 2020 reporting period.
- The monthly submissions must also include a running total of outlays⁹ for each award in File C funded with COVID-19 supplemental relief funds.
- Two additional data elements, significant in promoting the full and transparent reporting for COVID-19 spending, would be tested under the DATA Act, resulting in a total of 59 applicable data elements to be tested during the fiscal year (FY) 2021 DATA Act audit. The two additional data elements are:
 - National Interest Action code P20C, which was added to Federal Procurement Data System-Next Generation (FPDS-NG) to assist in identifying procurement actions related to the COVID-19 response.
 - Use of a disaster emergency fund code to include covered funds in the Coronavirus Aid, Relief, and Economic Security Act¹⁰ that are not designated as emergency pursuant to the Balanced Budget and Emergency Deficit Control Act of 1985,¹¹ in order to provide similar transparency for Coronavirus Aid, Relief, and Economic Security Act funding.

⁹ Outlays are records in File C without a transaction obligation.

¹⁰ Public Law 116-136 (March 27, 2020)

¹¹ Public Law 99-177 (December 12, 1985)

OPM's DATA Act Process

OPM's Office of the Chief Financial Officer (OCFO) is responsible for ensuring that OPM complies with DATA Act requirements. Specifically, the OCFO's Financial Operations Management:

- Populates the RSS, Files A through C, by utilizing OPM's data element components, including representatives from the offices of Procurement, Budget, Financial System, and Accounting. The Consolidated Business Information System (CBIS)¹² generates File B, object class and program activity detail information, and File C, award financial detail information, per the RSS. The DATA Act Broker generates File A, appropriations account detail information, as a starting point for agencies' monthly submission to USAspending.gov.
- Collects and reconciles data from the data element components prior to the SAO certifying within the DATA Act Broker. The DATA Act Broker facilitates reconciliation between all applicable files, A through D, via validation, cross-file validation and finally upon submission as certified by the SAO.
- Utilizes the DATA Act Broker as a checks and balances mechanism to ensure that Files A through F are valid. The DATA Act Broker displays separate error and warning messages as a result of each file validation. OPM is unable to submit data until any errors are corrected.

Subject Matter Experts

OPM has aligned knowledgeable personnel within its DATA Act Implementation Working Group (DAIW) to provide a vision for a successful implementation of the DATA Act and its requirements. The DAIW has an effective management structure with clearly defined roles and responsibilities, which include, but are not limited to the:

- Senior Accountable Official, who for the DATA Act implementation is also OPM's Chief Financial Officer, or designee, and who assumes responsibility for coordinating and collaborating OPM's efforts in developing and implementing the DATA Act and data quality framework for reporting OPM Federal spending information, which includes such things as: (1) ensuring that all activities surrounding the implementation of the DATA Act are completed efficiently, effectively, and on time; (2) communicating roles and responsibilities to DAIW team members; and (3) ensuring reliability of the financial

¹² After the data migration to the Federal Aviation Administration in May 2021, CBIS is no longer being used by OPM.

information reported so that it is in compliance with applicable laws and regulations, including the completion of annual assurance statements.

- Chief Acquisition Officer, who is also OPM's Senior Procurement Executive, and who (1) develops and monitors a process to ensure timely and accurate reporting of contractual actions to the FPDS-NG and USAspending.gov; (2) makes necessary adjustments to policies, procedures, and training; (3) provides an annual statement certifying the completeness and accuracy of OPM procurement data including the verification and validation results; and (4) provides a description of activities to assure data input accuracy.
- Chief Information Officer, who is responsible for endorsing and providing input on OPM's DATA Act implementation and serves as the lead information technologist in creating the vision of the DATA Act within OPM's infrastructure and architecture, which includes developing the agency's information technology (IT) architecture and establishing agency IT policies, standards, and processes.
- Executive Advisor to the DATA Act Working Group, who is also OPM's Deputy Chief Financial Officer, and who provides input to help guide the project's direction, strategic direction, and guidance to users and other stakeholders on CBIS activities and system requirements. The Executive Advisor also validates high-level business functionality of the system through testing and deployment.

Information Technology Systems under the DATA Act

In FY 2020 OPM used three separate source systems, from which the DATA Act Broker retrieved financial data, to comply with DATA Act reporting standards: (1) CBIS, an Oracle application, for its Salaries & Expenses and Revolving Fund business operations used by the OCFO, (2) the Federal Financial System, a Consultants to Government and Industries - American Management System mainframe solution used for its Trust Funds processing by the OCFO, and (3) the Procurement Information System for Management (PRISM), a contract writing system used by OPM's Office of Procurement Operations (OPO) that resides within CBIS. CBIS and PRISM are older, or legacy, systems that do not communicate with one another, which requires the manual input of data by the OCFO and OPO.

In November 2020, OPM certified that its FY 2020 fourth quarter data populated in Files C and D1, and submitted in accordance with the DATA Act, was validated in Treasury's DATA Act

Broker. The source of the File C data was OPM's CBIS¹³, PRISM¹⁴, and FPDS-NG¹⁵. The Treasury DATA Act Broker produces File D1.

In May 2021, OPM transitioned from CBIS to a new contract writing system called DELPHI¹⁶. The transition to the DELPHI environment required the OCFO and OPO to perform a "data cleanup" to resolve unliquidated obligation balances within CBIS, and close out contract obligations that were within six years after the accrual of the claim, as prescribed in OPM's *FY 2020 Data Cleanup – De-obligation of Unliquidated Obligations Memorandum* and 41 U.S.C. § 7103(a)(4), *Decision by contracting officer – Time for submitting claims*. The obligations closed out were for previously awarded contracts and obligations and were not updated in FPDS-NG.

The General Services Administration has also begun the migration of some legacy systems. In May 2021, the Integrated Award Environment (IAE) merged SAM.gov, IAE's largest system, into the modernized beta.SAM.gov environment. The system provides a modern portal for entities to register, update, renew, and check the status of their registration in the rebranded SAM.gov. This transition corresponds with the General Services Administration's commitment to modernize the IAE systems to improve the user experience.

The DAIMS provides a standardized definition and conceptual model for the information relevant to the domain and public reporting of U.S. Federal spending. The DAIMS, version 2.0¹⁷ (or current version at the time of agency submission) is comprised of two components: (1) RSS and (2) IDD. The data files included in the DAIMS are:

- Files A through C represent OPM's RSS submission:
 - File A - appropriations account
 - File B - object class and program activity

¹³ CBIS was used by the OCFO to manage the financial resources and obligations of OPM. CBIS' functionality includes the management of OPM's general ledger, accounts payable, accounts receivable, purchasing, procurement, and budgeting processes.

¹⁴ PRISM is a web-based application that supports the acquisition management lifecycle, from requisitioning through source selection, award, post-award management, and closeout used by OPO.

¹⁵ FPDS-NG contains data that the Federal Government uses to create recurring and special reports to the President, the Congress, the Government Accountability Office, Federal executive agencies and the public.

¹⁶ The DELPHI system is a multi-tier, distributed, financial management system that provides financial and procurement management functions for OPM and is designated as the core financial management system for Salaries and Expenses and Revolving Fund business processes.

¹⁷ For the fourth quarter FY 2020 data submission, DAIMS version 2.0 is the current version.

- File C -award financial
- Files D through F represent the IDD extracts from existing systems:
 - Files D1 - award (procurement)
 - Files D2 - award (financial assistance)
 - File E - additional awardee attributes
 - File F - sub-award attributes¹⁸

Consistent with Federal terms and conditions, entities receiving awards are required to submit accurate data to the SAM and the FFATA Sub-Award Reporting System maintained by the General Services Administration. The quality of this data is the legal responsibility of the award recipient. File E and F data remains the awardee's responsibility, in accordance with the terms and conditions of Federal agreements. Agencies are responsible for assuring controls are in place to verify current recipient registration in SAM, at the time of the financial assistance award, and resolving audit findings which may indicate if recipients are not complying with requirements to register or report sub-awards.

Data reported from these two award-reporting systems is generated in the DATA Act Broker for display on USAspending.gov. As outlined in OMB's Management Procedures Memorandum 2016-03, the authoritative sources for the data reported in Files E and F are SAM and the FFATA Sub-award Reporting System, respectively, with no additional action required of Federal agencies. It is optional for IGs to assess Files E and F as the quality of this data is the legal responsibility of the recipient and agencies are not responsible for certifying the quality of data reported by awardees.

Previous Office of the Inspector General Reports

In FY 2019, the OIG conducted an audit of the *U.S. Office of Personnel Management's Data Submission and Compliance with the Digital Accountability and Transparency Act* and issued Report Number 4A-CF-00-19-025 on November 6, 2019, in which we identified one area where OPM needs to strengthen controls over its DATA Act submission process to ensure that no discrepancies exist in the linkages between Files C and D1. Based on testing performed during this year's audit, we determined that one recommendation from Report Number 4A-CF-00-19-025 remains open and one recommendation is resolved. The status of the two recommendations is outlined in Appendix I.

¹⁸ Files D2, E and F do not apply to OPM.

In FY 2017, the OIG conducted an audit of the *U.S. Office of Personnel Management's Data Submission and Compliance with the Digital Accountability and Transparency Act* and issued Report Number 4A-CF-00-17-033 on November 9, 2017, in which we identified three areas of improvement that, when addressed, could have a positive impact on OPM's DATA Act reporting. All three recommendations and the audit have been closed.

In FY 2017, the OIG conducted a DATA Act Readiness Review and issued *Management Advisory Report – Digital Accountability and Transparency Act Readiness Review*, Audit Report Number 4A-CF-00-16-038, on February 16, 2017, in which we reported that OPM's implementation process was on track to meet the DATA Act requirements. There were no recommendations in the report.

II. Objectives, Scope, and Methodology

Objectives

The objectives of our audit were to assess (1) the completeness, accuracy, timeliness, and quality of FY 2020, fourth quarter, financial and award data submitted for publication on USAspending.gov, and (2) OPM's implementation and use of the Government-wide financial data standards established by OMB and Treasury.

The recommendations included in this final report address the objectives.

Scope and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards as established by the Comptroller General of the United States. These 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 objectives.

The scope of our audit covered FY 2020, fourth quarter, financial and award data submitted for publication by OPM, on USAspending.gov, and applicable procedures, certifications, documentation, and controls related to this process. The total population consisted of 2,702 non-COVID-19 transactions from File C, fourth quarter of FY 2020, and the entire universe of 23 COVID-19 outlays from File C, third month (September) of the fourth quarter of FY 2020. We performed our audit virtually from February 19 through August 30, 2021.

To accomplish our audit objectives noted above, we:

- Interviewed OCFO and OPO personnel;
- Obtained an understanding of regulatory criteria related to OPM's responsibilities to report financial and award data under the DATA Act;
- Reviewed OPM's DQP;
- Assessed OPM's internal and information system controls in place as they relate to the extraction of data from the source systems and the reporting of data to Treasury's DATA Act Broker, in order to assess audit risk and design audit procedures;
- Reviewed and reconciled the FY 2020, fourth quarter, summary-level data submitted by OPM for publication on USAspending.gov;
- Reviewed a statistically valid sample from the FY 2020 fourth quarter, financial and award data submitted by OPM for publication on USAspending.gov;

- Reviewed the entire non-statistical universe of COVID-19 outlays, from the third month of the FY 2020 fourth quarter financial and award data, submitted by OPM in File C;
- Assessed the completeness, accuracy, timeliness, and quality of the financial and award data sampled; and
- Assessed OPM's implementation and use of the 59 data elements/standards established by OMB and Treasury.

In planning our work and gaining an understanding of the regulatory criteria, OPM's DQP, systems, processes, and internal and information system controls put in place to facilitate reporting of financial and award data to the DATA Act Broker, we considered, but did not rely on, OPM's internal control structure to the extent necessary to develop our audit procedures. These procedures were analytical and substantive in nature. We gained an understanding of management's procedures and controls to the extent necessary to achieve our audit objectives. The purpose of our audit was not to provide an opinion on internal controls but merely to evaluate controls over the data submitted by OPM for publication on USAspending.gov.

Our audit included such tests and analysis of the data OPM's DAIW submitted to ensure compliance with the DATA Act and reporting processes, including documented policies and procedures, numerical data and narratives as reported in USAspending.gov, and other applicable information as we considered necessary to accomplish our objectives.

In conducting our audit, we relied to varying degrees on computer-generated data. We performed tests to evaluate OPM's systems, processes, and internal controls in place over financial data management as required by the DATA Act. Due to time constraints, we did not verify the reliability of the data generated by the various information systems. However, nothing came to our attention during audit testing utilizing the computer-generated data to cause us to doubt its reliability. In addition, the OIG conducted three information technology audits in FY 2021 in support of our DATA Act responsibilities. Specifically, we:

- Assessed OPM's financial and award systems, processes, and internal controls in place over data management.
- Assessed the general and application controls pertaining to financial management systems (e.g., grants, loans, procurement) from which the data elements were derived and linked.
- Assessed OPM's key information technology system (CBIS) to provide data for DATA Act reporting.

Based on the recommendations identified, we have no reason to believe that the system generated data from the Federal Financial System or CBIS is not sufficient to achieve the audit objectives outlined in this DATA Act audit. We reported the results of this work in the following reports, which are already or will soon be available on the OIG's website:

- Federal Information Security Modernization Act Audit - FY 2020 (Report Number 4A-CI-00-20-010, final report issued on October 30, 2020);
- Audit of the IT Security Controls of the U.S. Office of Personnel Management's Business Financial System (Report Number 4A-CF-00-21-010, final report issued on September 14, 2021); and
- Audit of the IT Security Controls of OPM's Consolidated Business Information System (Report Number 4A-CF-00-21-009, final report issued on September 9, 2021).

We used IDEA Data Analytics software to select a statistically random sample from File C to test the accuracy, completeness, timeliness, and quality of OPM's FY 2020, fourth quarter, financial and award data submitted for publication on USAspending.gov. CIGIE's Working Group guidance specified that the OIG should select a sample size of 385; however, agencies with smaller transaction populations, such as OPM, where the 385 represented 5 percent or more of the population, were guided to apply a finite correction factor using the formula $385/[1+(385/N)]$, where "N" represents the transaction population size. Using the finite correction for OPM, we statistically selected a random sample size of 150 out of 2,702 transactions for File C for the fourth quarter of FY 2020. In addition, we selected the entire non-statistical universe of 23 COVID-19 outlay¹⁹ records from September 2020, the third month of the fourth quarter of FY 2020 from File C.

We consulted with a statistician to perform statistical projections, based on the results of our statistical sample testing, for each of the three overall error rates: completeness is 41.3 percent, accuracy is 41.3 percent, and timeliness is 41.1 percent. The results from our statistical sample testing were projected to the universe. The results from our non-statistical samples were not projected to the universe.

¹⁹ Agencies can optionally report outlays other than COVID-19 in File C, but those outlays are not required to be tested for this audit cycle.

III. Audit Findings and Recommendations

For the areas below, we determined that OPM's DATA submission was complete and submitted timely. However, the controls over OPM's DATA Submission and Compliance with the DATA Act processes should be strengthened.

1. DATA Act Reporting Requirement

Based on our review of OPM's FY 2020, fourth quarter, financial and award data submission to USAspending.gov, and other documentation provided by the agency, we determined that OPM is in compliance with the reporting requirements of the DATA Act as stated below:

A. Completeness and Timeliness of OPM's DATA Act Submission

We evaluated OPM's DATA Act submission to Treasury's DATA Act Broker and determined that the submission was complete and submitted timely, and with no data limitation disclosures. To determine the completeness of the submission, we evaluated Files A, B, and C to verify that all transactions and events that should have been recorded were recorded in the proper period. To be considered timely, OPM's data had to be submitted and certified within 45 days of quarter end.

B. Accuracy of Summary-Level Data and Linkages for Files A, B, and C

We performed summary-level data reconciliations and linkages for Files A and B to determine the completeness of Files A and B and did not identify any variances. The test results verified: (1) summary-level data from File A matched the Agency's Governmentwide Treasury Account Symbol SF-133; (2) the totals and Treasury Account Symbol identified in File A matched File B; and (3) all object class codes from File B matched codes defined in Section 83 of OMB Circular No. A-11.

C. Record-Level Data and Linkages for Files C and D1

Statistical Non-COVID-19 Transactions

We selected a statistically random sample of 150 out of 2,702 transactions from File C and tested 59 data elements for completeness, accuracy, and timeliness to File D1.

- **Completeness of the Data Elements** - The projected error rate for the completeness of the data elements is 41.3 percent²⁰, with a margin of error rate of 12.7 percent. A data element was considered complete if the required data element that should have been reported was reported.

²⁰ Based on a 95 percent confidence level, the projected error rate for the completeness of the data elements is between 34.9 percent and 47.6 percent.

- Accuracy - The projected error rate for the accuracy of the data elements is 41.3 percent²¹, with a margin of error rate of 12.7 percent. A data element was considered accurate when amounts and other data relating to recorded transactions were recorded in accordance with the DAIMS RSS, IDD, and the online data dictionary²², and agree with the authoritative source records.
- Timeliness of the Data Elements - The projected error rate for the timeliness of the data elements is 41.1 percent²³, with a margin of error rate of 12.7 percent. The timeliness of the data elements was based on the reporting schedules defined by the procurement and financial assistance requirements in the FFATA, Federal Acquisition Regulation²⁴, FPDS-NG, Financial Assistance Broker Submission²⁵ and DAIMS.

Non-Statistical COVID-19 Transactions

We selected the total universe of 23 outlays from September 2020 and tested 59 data elements for completeness, accuracy, and timeliness.

- Results of Linkages from File C to Files B, D1, and D2 - We tested the linkages between File C to File B by Treasury Account Symbol, object class, and program activity and the linkages between File C to File D1 by both the Procurement Instrument Identifier (PIID) and Parent Award ID. The applicable Treasury Account Symbol, object class, and program activity data elements from File C existed in File B; all of the PIIDs/Parent Award IDs from File C existed in File D1; and all PIIDs/Parent Award IDs in Files D1 existed in File C.

²¹ Based on a 95 percent confidence level, the projected error rate for the accuracy of the data elements is between 34.9 percent and 47.6 percent.

²² Online Data Dictionary contains a comprehensive list of data elements with definitions and associated metadata.

²³ Based on a 95 percent confidence level, the projected error rate for the timeliness of the data elements is between 34.8 percent and 47.5 percent.

²⁴ The Federal Acquisition Regulation is a regulation, codified in Parts 1 through 53 of Title 48 of the *Code of Federal Regulations*, which governs acquisitions of goods and services by executive branch agencies. It addresses the various aspects of the acquisition process, from acquisition planning to contract formation to contract management.

²⁵ The Financial Assistance Broker Submission file includes the complete set of elements required for submitting financial assistance award data.

D. Data Quality

The quality of the data elements was determined using the non-statistical and statistical testing results for completeness, accuracy, and timeliness. The combined results of the statistical sample with the results of the non-statistical testing represent the score in a quality scorecard. Table 1 provides the error range in determining the quality of the data elements.

**OPM's DATA
Quality is of a
Moderate level.**

Table 1: CIGIE Quality Scorecard Ratings²⁶

Quality Level		
Range		Level
0.0	69.9	Lower
70.0	84.9	Moderate
85.0	94.9	Higher
95.0	100	Excellent

Appendix 7 of the CIGIE FAEC IG Guide to Compliance under the DATA Act provided a quality scorecard methodology designed to deliver government-wide consistency in the measurement of quality. The scorecard consisted of the following factors:

- **Timeliness of Agency Submission** - Following the guidance, we input submission requirements based on OPM's COVID-19 funding received, including the due date(s) and submission date(s), resulting in a score of 5.0 quality points.
- **Completeness of Summary-Level Data (Files A and B)** - Following the guidance, we input responses to questions related to summary level data for Files A and B, including if summary-level data from File A matched OPM's Governmentwide Treasury Account Symbol SF-133 and all Treasury Account Symbols in File A matched File B, resulting in a score of 10.0 quality points.

²⁶ Ratings are from *the CIGIE FAEC Inspector General Guide to Compliance Under DATA Act*, Section 820, Quality Assessment - Scorecard.

- Suitability of File C for Sample Selection - Following the guidance, we input responses related to questions on the suitability of File C, including the number of DATA Broker Act warnings on data submitted by OPM, resulting in a score of 7.7 quality points.
- Record-Level Linkages (Files C and D1/D2) - Following the guidance, we input responses to questions related to record-level linkages, including PIID and Federal Award Identification Number (FAIN) related questions, resulting in a score of 7.0 quality points.
- COVID-19 Outlay Testing - Non-statistical Sample - Following the guidance, we input responses to questions related to COVID-19 outlay testing, resulting in scores of 2.0 quality points for completeness, 4.0 quality points for accuracy, and 2.0 quality points for timeliness, for a total of 8.0 quality points.
- Data Element Testing - Statistical Sample - Following the guidance, we input the statistical sample results, resulting in scores of 8.8 quality points for completeness, 17.6 quality points for accuracy, and 8.8 quality points for timeliness.

The scores were automatically populated into the quality scorecard based on our responses to the questions for each area. Based on the results of our statistical and non-statistical testing, OPM scored 73 points, as shown in Table 2, which means that the quality of OPM's data is considered Moderate.

Table 2: U.S. Office of Personnel Management Quality Scorecard²⁷

U.S. Office of Personnel Management			Maximum Point Possible	
FY 2021 DATA Act Quality Scorecard			Without Outlay (No COVID-19 Funding)	With Outlay (COVID-19 Funding)
	Criteria	Score		
Non- Statistical	Timeline of Agency Submission	5.0	5.0	5.0
	Completeness of Summary Level Data (File A & B)	10.0	13.0	10.0
	Suitability of File C for Sample Selection	7.7	13.0	10.0
	Record-Level Linkage (File C & D1/D2)	7.0	9.0	7.0
	COVID-19 Outlay Testing Non-Statistical Sample	8.0	0.0	8.0
Statistical	Completeness	8.8	15.0	15.0
	Accuracy	17.6	30.0	30.0
	Timeline	8.8	15.0	15.0
Quality Score	Moderate	73 (rounded)	100.0	100.0

²⁷ OPM's scores are from the OIG's analysis of OPM data provided. The scorecard is from the *CIGIE FAEC Inspector General Guide to Compliance Under DATA Act*, Section 820, Quality Assessment - Scorecard.

E. Implementation and Use of the Data Standards

We evaluated OPM's implementation and use of the government-wide financial data standards for spending information as developed by OMB and Treasury. Based on our test work, OPM has fully implemented and is using those data standards as defined by OMB and Treasury by using linkages/mapping of files A through C by all of the data elements outlined in their DQP for procurement and financial assistance, as applicable. In addition:

- Our comparative results for data elements tested in FY 2019 and 2021 determined that for Files A and D1, there was no change in the data elements used, except for the Disaster Emergency Fund Code (No. 59), which was added by CIGIE during this reporting period for COVID-19 spending (see Exhibit 1).

Exhibit 1: Comparative Results of OPM Data for the 59 Data Elements

2021		2019		
DAIMS Element Number	Data Element Name	DAIMS Element Number	Data Element Name	Percent Change
1	Awardee/Recipient Legal Entity Name	1	Awardee/Recipient Legal Entity Name	0%
2	Awardee/Recipient Unique Identifier	2	Awardee/Recipient Unique Identifier	0%
3	Ultimate Parent Unique Identifier	3	Ultimate Parent Unique Identifier	0%
4	Ultimate Parent Legal Entity Name	4	Ultimate Parent Legal Entity Name	0%
5	Legal Entity Address	5	Legal Entity Address	0%
6	Legal Entity Congressional District	6	Legal Entity Congressional District	0%
7	Legal Entity Country Code	7	Legal Entity Country Code	0%
8	Legal Entity Country Name	8	Legal Entity Country Name	0%

2021		2019		
DAIMS Element Number	Data Element Name	DAIMS Element Number	Data Element Name	Percent Change
9	Highly Compensated Officer Name	9	Highly Compensated Officer Name	0%
10	Highly Compensated Officer Total Compensation	10	Highly Compensated Officer Total Compensation	0%
11	Amount of Award	11	Amount of Award	0%
12	Non-Federal Funding Amount	12	Non-Federal Funding Amount	0%
13	Federal Action Obligation	13	Federal Action Obligation	0%
14	Current Total Value of Award	14	Current Total Value of Award	0%
15	Potential Total Value of Award	15	Potential Total Value of Award	0%
16	Award Type	16	Award Type	0%
17	NAICS Code	17	NAICS Code	0%
18	NAICS Description	18	NAICS Description	0%
19	Catalog of Federal Domestic Assistance Number	19	Catalog of Federal Domestic Assistance Number	0%
20	Catalog of Federal Domestic Assistance Title	20	Catalog of Federal Domestic Assistance Title	0%
21	Treasury Account Symbol	21	Treasury Account Symbol	0%
22	Award Description	22	Award Description	0%

2021		2019		
DAIMS Element Number	Data Element Name	DAIMS Element Number	Data Element Name	Percent Change
23	Award Modification / Amendment Number	23	Award Modification / Amendment Number	0%
24	Parent Award ID Number	24	Parent Award ID Number	0%
25	Action Date	25	Action Date	0%
26	Period of Performance Start Date	26	Period of Performance Start Date	0%
27	Period of Performance Current End Date	27	Period of Performance Current End Date	0%
28	Period of Performance Potential End Date	28	Period of Performance Potential End Date	0%
29	Ordering Period End Date	29	Ordering Period End Date	0%
30	Primary Place of Performance Address	30	Primary Place of Performance Address	0%
31	Primary Place of Performance Congressional District	31	Primary Place of Performance Congressional District	0%
32	Primary Place of Performance Country Code	32	Primary Place of Performance Country Code	0%
33	Primary Place of Performance Country Name	33	Primary Place of Performance Country Name	0%

2021		2019		
DAIMS Element Number	Data Element Name	DAIMS Element Number	Data Element Name	Percent Change
34	Award ID Number (PIID/FAIN)	34	Award ID Number (PIID/FAIN)	0%
35	Record Type	35	Record Type	0%
36	Action Type	36	Action Type	0%
37	Business Type	37	Business Type	0%
38	Funding Agency Name	38	Funding Agency Name	0%
39	Funding Agency Code	39	Funding Agency Code	0%
40	Funding Sub Tier Agency Name	40	Funding Sub Tier Agency Name	0%
41	Funding Sub Tier Agency Code	41	Funding Sub Tier Agency Code	0%
42	Funding Office Name	42	Funding Office Name	0%
43	Funding Office Code	43	Funding Office Code	0%
44	Awarding Agency Name	44	Awarding AgencyName	0%
45	Awarding Agency Code	45	Awarding AgencyCode	0%
46	Awarding Sub Tier Agency Name	46	Awarding Sub Tier Agency Name	0%
47	Awarding Sub Tier Agency Code	47	Awarding Sub Tier Agency Code	0%
48	Awarding Office Name	48	Awarding Office Name	0%
49	Awarding Office Code	49	Awarding Office Code	0%

2021		2019		
DAIMS Element Number	Data Element Name	DAIMS Element Number	Data Element Name	Percent Change
50	Object Class	50	Object Class	0%
51	Appropriation Account	51	Appropriation Account	0%
52	Budget Authority Appropriated	52	Budget Authority Appropriated	0%
53	Obligation	53	Obligation	0%
54	Unobligated Balance	54	Unobligated Balance	0%
55	Other Budgetary Resource	55	Other Budgetary Resource	0%
56	Program Activity	56	Program Activity	0%
57	Outlay35	57	Outlay35	0%
163	National Interest Action (No.58)	163	National Interest Action (No.58)	0%
430	Disaster Emergency Fund Code (No.59)	430	Disaster Emergency Fund Code (No.59)	100%

- For Files B and C, the Disaster Emergency Fund Code (No. 59) was used; and
- OPM's DQP did not identify risks related to the data elements identified with the highest instances of error. The data elements with the highest instances of errors include (see Exhibit 2):
 - Federal Action Obligation, with an absolute value of \$15,727,663,
 - Transaction Obligated Amount, with an absolute value of \$174,830,
 - Base and Exercise Options Value, with an absolute value of \$10,841,195, and

- USSGL497200_Downward Adjustments of Prior Year Paid Delivered Orders Obligations Refunds Collected_CPE, with an absolute value of \$430,571²⁸.

Exhibit 2: OPM's Results for Data Elements by Accuracy Error Rate²⁹

DAIMS Element Number	Data Element Name	A Accuracy	C Completeness	T Timeliness
1	Awardee/Recipient Legal Entity Name	72	72	72
2	Awardee/Recipient Unique Identifier	72	72	72
3	Ultimate Parent Unique Identifier	71	71	71
4	Ultimate Parent Legal Entity Name	71	71	71
5	Legal Entity Address	71	71	71
6	Legal Entity Congressional District	72	72	72
7	Legal Entity Country Code	71	71	71
8	Legal Entity Country Name	71	71	71
13	Federal Action Obligation	83	83	83
14	Current Total Value of Award	82	82	82
15	Potential Total Value of Award	82	82	82
16	Award Type	71	71	71
17	NAICS Code	71	71	71
18	NAICS Description	71	71	71
22	Award Description	71	71	71

²⁸ The absolute values are not projectable.

²⁹ These error rates do not reflect projected error rates to the population, but error rates from the sample alone. Data elements not applicable to OPM are not included.

DAIMS Element Number	Data Element Name	A Accuracy	C Completeness	T Timeliness
23	Award Modification / Amendment Number	71	71	71
24	Parent Award ID Number	71	71	71
25	Action Date	71	71	71
26	Period of Performance Start Date	71	71	71
27	Period of Performance Current End Date	71	71	71
28	Period of Performance Potential End Date	71	71	71
29	Ordering Period End Date	0	0	0
30	Primary Place of Performance Address	71	71	71
31	Primary Place of Performance Congressional District	71	71	71
32	Primary Place of Performance Country Code	71	71	71
33	Primary Place of Performance Country Name	71	71	71
34	Award ID Number (PIID/FAIN)	71	71	72
35	Record Type	85	85	84
36	Action Type	71	71	71
37	Business Types	71	71	71
38	Funding Agency Name	71	71	71
39	Funding Agency Code	71	71	71
40	Funding Sub Tier Agency Name	71	71	71
41	Funding Sub Tier Agency Code	71	71	71

DAIMS Element Number	Data Element Name	A Accuracy	C Completeness	T Timeliness
42	Funding Sub Tier Agency Name	71	71	71
43	Funding Office Name	71	71	71
44	Awarding Agency Name	71	71	71
45	Awarding Agency Code	71	71	71
46	Awarding Sub Tier Agency Name	71	71	71
47	Awarding Sub Tier Agency Code	71	71	71
48	Awarding Office Name	71	71	71
49	Awarding Office Code	71	71	71
50	Object Class	0	0	0
51	Appropriations Account	0	0	0
53	Obligation	0	0	0
56	Program Activity	0	0	0
163	National Interest Action	71	71	72
430	Disaster Emergency Fund Code	0	0	0

While OPM implemented and used the data standards defined by OMB and Treasury, there were some linkage issues between Files C and D1, as discussed below.

2. Linkage Discrepancies between Files C and D1

During our audit, we determined that OPM needs to strengthen controls over its DATA Act submission process to ensure that no discrepancies exist in the linkages between Files C and D1.

**Linkage
discrepancies
identified for 113
transactions.**

We reviewed a statistically selected random sample of 150 out of 2,702 non-COVID-19 transactions with obligated amounts³⁰ identified in File C from the fourth quarter of FY 2020 to verify linkages to File D1, and the entire universe of 23 COVID-19 outlays from the third month (September) of the fourth quarter of FY 2020. This resulted in a total of 173 transactions reviewed in the amount of \$24,962,453. We determined that all 23 COVID-19 outlays were properly reported in File C. However, we determined that 113 of the 150 non-COVID-19 sample transactions identified in File C are not in D1. Specifically:

- 71 of the 150 transactions were entered into PRISM, which is a component of CBIS, and FPDS-NG, but were not identified in File D1,
- 4 of the 150 transactions in File D1 did not match the transaction amounts in PRISM or FPDS-NG, and
- 38 of the 150 transactions contained complete and accurate data in File C; however, the information could not be linked to File D1. In addition, OPO stated that these 38 transactions were part of the DELPHI migration, and they did not meet the six-year statute of limitations requirement for closing out contracts.

The results for each condition are independent of each other.

The total for the 109 transactions missing from File D1 and 4 transactions with File D1 amounts that differed from what was reported in PRISM and FPDS-NG, for a total of 113 transactions, is \$7,069,150, out of 150 transactions sampled, totaling \$14,993,716. Details of our review were provided to the OCFO and OPO separately from this report.

The linkage discrepancies between Files C and D1 appear to be attributed to OPM's legacy systems, which require the manual input of data into PRISM and FPDS-NG, and Treasury's DATA Act Broker extraction of that data. OPM certified that the accuracy of the data populated in Files C and D1 submitted for the fourth quarter of FY 2020 was validated in the DATA Act Broker. However, OCFO's validation process did not ensure the linkage of all data across Files C and D1. In addition, OPO continues to have control deficiencies in the contract closeout process, due to CBIS and PRISM not being fully utilized to track and manage contracts that need to or have been closed out, as identified in our Final Audit Report on the Office of Procurement Operations' Contract Management Process, Report Number 4A-CA-00-15-041, dated July 8, 2016. Our recommendation to address that the closeout process has not been administered on the open obligations remains open and no corrective action documentation has been provided to

³⁰ *The Council of the Inspectors General on Integrity and Efficiency Federal Audit Executive Council Inspector General Guide to Compliance under the DATA Act*, December 2020, states "Remove rows without any outlays from File C. Outlay records are those rows in File C without a transaction obligated amount."

support that implementation has been completed. As of the date of this report, the OIG has been attempting to obtain sufficient evidence for more than five years.

The DATA Act of 2014 was enacted, in part, to "establish Government-wide data standards for financial data and provide consistent, reliable, and searchable Government-wide spending data that is displayed accurately for taxpayers and policy makers on USASpending.gov (or a successor system that displays the data)."

OMB's M-17-04, *Memorandum for Agency Senior Accountable Officials*, dated November 4, 2016, states that "[s]ince a DATA Act submission contains a combination of many data sets, the SAO will be required to attest to the validity and reliability of the complete DATA Act submission, including the interconnectivity/linkages (e.g., award ID linkage) across all the data in files A, B, C, D, E, and F. Where there are legitimate differences between files, the SAO should have categorical explanations for misalignments. To provide this assurance, agencies should have internal controls in place over all of the data reported for display [on] USASpending.gov per A-123."

OPM's *FY 2020 Data Cleanup – De-obligation of Unliquidated Obligations*, dated May 8, 2020, states that OPM's effort to resolve unliquidated balances within CBIS included cleaning up "agency-wide unliquidated obligations that have aged by at least six years, based on the statute of limitations for closing out the contract. The six-year statute of limitation acts as a bar on contract claims against the Government. Every claim of which the United States Court of Federal Claims has jurisdiction shall be barred unless the petition thereon is filed within six years after such claim first accrues."

41 U.S.C. § 7103(a)(4), *Decision by contracting officer - Time for submitting claims*, dated January 24, 2011, states that "In general.-Each claim by a contractor against the Federal Government relating to a contract and each claim by the Federal Government against a contractor relating to a contract shall be submitted within 6 years after the accrual of the claim."

As result of the linkage discrepancies, the data submitted by OPM for publication on USASpending.gov includes inaccuracies.

Recommendation 1 (Rolled Forward from FY 2019)

We recommend that the OCFO work with OPO to strengthen controls to ensure Files C and D1 are valid, accurate, and complete as required by OMB-17-04. Controls at a minimum should include a review of Procurement Instrument Identifier Numbers, Transaction Obligation Amount, and Parent Award Identifier, and/or Data elements to ensure linkages across DELPHI and FPDS-NG.

OPM's Response:

“OPM concurs with the recommendation. As a federal shared service customer, OPM is now able to leverage the technical tools available to support review of DATA Act submission data, providing enhanced controls concerning the validity, accuracy, and completeness of files as required by OMB-17-04. FAA [Federal Aviation Administration] ESC [Enterprise Services Center] utilizes an internal Enterprise Data Quality (EDQ) application to support reconciliation and analysis on current period contract award transactions. The intent of this report is to mirror DATA Act Broker rules/warnings so that any issues can be identified for resolution before the monthly reporting window. This DATA Act Recon process will assist OCFO and OPO to meet DATA Act reporting compliance. As a standard practice, FAA ESC sends the DATA Act Recon Report to all customers on a regular reoccurring schedule. Currently, OPM receives the report weekly for review since migrating to the new platform. Appended to this response is the ESC’s AMKWI-310-00011 DATA Act AP Reconciliation Tool document which provides work instructions that define the steps required to review and/or deliver complete DATA Act AP Reconciliation report to shared service customers. It is OPM’s perspective that the documentation provided as part of this response serves as evidence of the enhanced controls implemented to ensure the validity, accuracy, and completeness of Files C and D1 as part of OPM’s monthly DATA Act submissions.”

OIG Comments:

OPM provided work instructions with their response that define the steps required to review and/or deliver complete DATA Act accounts payable reconciliation reports to shared service customers. The documentation provided shows enhanced controls to ensure the validity, accuracy, and completeness of Files C and D1 as part of OPM's monthly DATA Act submissions. The enhanced controls appear to be sufficient to address the recommendation; however, evidence was not provided to show that the linkage discrepancies between Files C and D1 no longer exist. As a result, this recommendation is considered resolved; however, closure will be determined during the audit resolution process once the controls can be tested and support is provided to show that linkage discrepancies no longer exist.

Recommendation 2 (Rolled Forward from FY 2019)

We recommend that OCFO work with OPO to ensure that system linkage discrepancies between DELPHI and FPDS-NG are addressed prior to certifying data submitted in accordance with the DATA Act.

OPM's Response:

“OPM concurs [with] the recommendation. The migration to the FAA ESC’s shared service financial management platform leverages upgraded technology for the financial management and procurement business applications. OPM is now using the FAA ESC PRISM, which is on version 7.4 and supported by the vendor, Unison. As a result of this migration, OPM users are

now able to establish a connection to the Federal Procurement Data System (FPDS-NG). This integrated connection between ESC PRISM and FPDS-NG minimizes system linkage discrepancies and reduces the need for any manual entry in FPDS-NG application directly. Included as evidence are screenshots attached that demonstrate the one-time setup users perform to establish their FPDS profile in ESC PRISM. OPM's perspective is this evidence displays the technical actions implemented to resolve system linkages between Delphi and FPDS-NG. Now that OPM is on the Delphi platform, OPM is requesting that this recommendation is marked for closure since the previous recommendation was opened as part of an audit with the legacy CBIS environment.”

OIG Comments:

OPM provided screenshots that demonstrate the one-time setup users perform to establish their FPDS profile in ESC PRISM. OPM's perspective was that this evidence displays the technical actions implemented to resolve system linkages between Delphi and FPDS-NG. However, the evidence provided does not show that the technical actions implemented will resolve the linkage discrepancies between Delphi and FPDS-NG. To close this recommendation, and the prior year recommendation, the data linkages will need to be tested to ensure that the updated controls are working effectively and that any linkage discrepancies are addressed prior to certifying data submitted in accordance with the DATA Act.

Recommendation 3

We recommend that OPO work with the Contracting Officer Representatives to establish and implement management controls to ensure that contracts are tracked and managed through the closeout process and adequate documentation is maintained in the contract files, including evidence of contract completion and closeout³¹.

OPM's Response:

“OPM concurs with the recommendation. OPM agrees that lack of ability to fully utilize CBIS/PRISM to track and manage contracts led to control deficiencies in the contract closeout process. As OPM has recently migrated to FAA's DELPHI financial service platform, OPO plans to work with Program Officials, including CORs [Contracting Officer Representatives], to map out the ESC PRISM closeout process and improve management controls that will govern the closeout process. OPO looks forward to leveraging new capabilities provided by ESC PRISM to manage the closeout

³¹ The issue of OPO not tracking and managing contracts that need to or have been closed out was also identified in our Final Audit Report on the OPO Contract Management Process, Report Number 4A-CA-00-15-041, dated July 8, 2016.

process. OPO will share the new contract closeout process map/ procedures with OIG no later than February 1, 2022.”

Appendix I

DATA Act Outstanding Recommendation

Fiscal Year	Recommendation Number	Recommendation	Recommendation History	Current Status
2019	1	We recommend that the OCFO work with OPO to strengthen controls to ensure Files C and D1 are valid, accurate, and complete as required by OMB-17-04. Controls at a minimum should include a review of Procurement Instrument Identifier Numbers, Transaction Obligation Amount, and Parent Award Identifier, and/or Data elements to ensure linkages across PRISM, FPDS-NG, and CBIS.	Rolled Forward from FY 2019 Recommendation 2	Resolved, See recommendation 1 in this report
2019	2	We recommend that the OCFO address system linkage discrepancies between PRISM, FPDS-NG, and CBIS.	Rolled Forward from FY 2019 Recommendation 1	Open, See recommendation 2 in this report

Appendix II



Chief Financial
Officer

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
Washington, DC 20415

October 5, 2021

Memorandum for Senior Team Leader, Internal Audits
Tony. D Ashby

From: Rochelle Bayard ROCHELLE BAYARD Digitally signed by ROCHELLE BAYARD
Associate Chief Financial Officer
Financial Strategy and Operations
Date: 2021.10.18 16:25:00 -04'00'

Todd Anthony Shreena L. Lyons Digitally signed by Shreena L. Lyons
Senior Procurement Executive
Office of Procurement Operations
Date: 2021.10.18 17:59:06 -04'00'

Subject: Audit of the U.S. Office of Personnel Management's Data Submission and
Compliance with the Digital Accountability and Transparency Act of 2014,
Report No. 4A-CF-00-20-044

Thank you for providing OPM the opportunity to respond to the Office of the Inspector General (OIG) draft report, *Audit of the U.S. Office of Personnel Management's Data Submission and Compliance with the Digital Accountability and Transparency Act of 2014*, Report No. 4A-CF-00-20-044, dated September 10, 2021.

In May 2021, OPM migrated to the Federal Aviation Administration's (FAA) Enterprise Services Center's (ESC) shared service financial management platform. As a shared services customer, OPM anticipates leveraging the policies and procedures associated with the DATA Act submission process that have been established by ESC to support all DATA Act submissions published as of May 2021.

Responses to your recommendations including planned corrective actions, as appropriate, are provided below.

Recommendation 1:

We recommend that the OCFO work with the OPO to strengthen controls to ensure Files Cand D1 are valid, accurate, and complete as required by OMB-17-04. Controls at a minimum should include a review of Procurement Instrument Identifier Numbers, Transaction Obligation Amount, and Parent Award Identifier, and/or Data elements to ensure linkages across DELPHI and FPDS-NG.

Management Response:

OPM concurs with the recommendation. As a federal shared service customer, OPM is now able to leverage the technical tools available to support review of DATA Act submission data, providing enhanced controls concerning the validity, accuracy, and completeness of files as required by OMB-17-04. FAA ESC utilizes an internal EnterpriseData Quality (EDQ) application to support reconciliation and analysis on current period contract award transactions. The intent of this report is to mirror DATA Act Broker rules/warnings so that any issues can be identified for resolution before the monthly reporting window. This DATA Act Recon process will assist OCFO and OPO to meet DATA Act reporting compliance. As a standard practice, FAA ESC sends the DATA Act Recon Report to all customers on a regular reoccurring schedule. Currently, OPM receives the report weekly for review since migrating to the new platform. Appended to this response is the ESC's AMKWI-310-00011 DATA Act AP Reconciliation Tool document which provides work instructions that define the steps required to review and/or deliver complete DATA Act AP Reconciliation report to shared service customers. It is OPM's perspective that the documentation provided as part of this response serves as evidence of the enhanced controls implemented to ensure the validity, accuracy, and completeness of Files C and D1 as part of OPM's monthly DATA Act submissions.

Recommendation 2:

We recommend that the OCFO work with the OPO to ensure that system linkage discrepancies between DELPHI and FPDS-NG are addressed prior to certifying data submitted in accordance with DATA Act.

Management Response:

OPM concurs the recommendation. The migration to the FAA ESC's shared service financial management platform leverages upgraded technology for the financial management and procurement business applications. OPM is now using the FAA ESC PRISM, which is on version 7.4 and supported by the vendor, Unison. As a result of this migration, OPM users are now able to establish a connection to the Federal Procurement Data System (FPDS-NG). This integrated connection between ESC PRISM and FPDS-NG minimizes system linkage discrepancies and reduces the need for any manual entry in FPDS-NG application directly. Included as evidence are screenshots attached that demonstrate the one-time setup users perform to establish their FPDS profile in ESC PRISM. OPM's perspective is this evidence displays the technical actions implemented to resolve system linkages between Delphi and FPDS-NG. Now that OPM is on the Delphi platform, OPM is requesting that this recommendation is marked for closure since the previous recommendation was opened as part of an audit with the legacy CBIS environment.

Recommendation 3:

We recommend that the OPO work with the Contracting Officer Representatives to establish and implement management controls to ensure that contracts are tracked and managed

through the closeout process and adequate documentation is maintained in the contract files, including evidence of contract completion and closeout.

Management Response:

OPM concurs with the recommendation. OPM agrees that lack of ability to fully utilize CBIS/PRISM to track and manage contracts led to control deficiencies in the contract closeout process. As OPM has recently migrated to FAA's DELPHI financial service platform, OPO plans to work with Program Officials, including CORs, to map out the ESC PRISM closeout process and improve management controls that will govern the closeout process. OPO looks forward to leveraging new capabilities provided by ESC PRISM to manage the closeout process. OPO will share the new contract closeout process map/procedures with OIG no later than February 1, 2022.

OPM appreciates the opportunity to respond to this draft report. If you have any questions regarding our response, please contact Erick Borda at 202.606.2413 or Erick.Borda@opm.gov.

CC:

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