



Review of the U.S. Department of Justice's Readiness to Implement the Digital Accountability and Transparency Act of 2014

REVIEW OF THE U.S. DEPARTMENT OF JUSTICE'S READINESS TO IMPLEMENT THE DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT OF 2014

EXECUTIVE SUMMARY

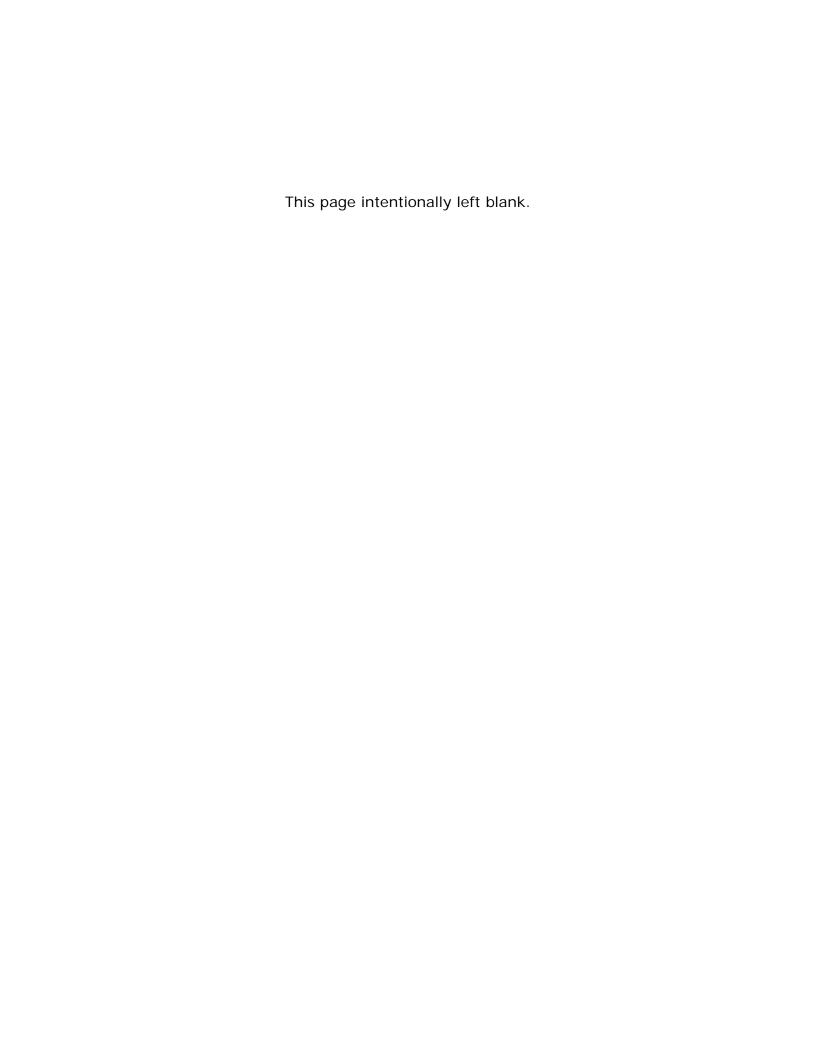
This report contains the results of the Department of Justice (Department) Office of the Inspector General's attestation review of the Department's assertion, as of August 31, 2016, that it will be ready to implement the requirements of the Digital Accountability and Transparency Act of 2014 (DATA Act).

On May 9, 2014, the President of the United States signed into law the DATA Act, expanding the *Federal Funding Accountability and Transparency Act of 2006* (FFATA) to increase accountability and transparency in Federal spending, and for other purposes. Through memorandum M-15-12, *Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable*, the Office of Management and Budget (OMB), in coordination with the Department of the Treasury (Treasury), provided guidance to federal agencies on current reporting requirements pursuant to the FFATA, as well as new requirements that agencies must employ pursuant to the DATA Act. We reviewed the Department's implementation plan and progress in implementing steps 1 through 4 of the *DATA Act Implementation Playbook* issued by Treasury's DATA Act Program Management Office to assist agencies in meeting their reporting requirements.

Our report states that nothing came to our attention that caused us to believe that a material modification should be made to the Department's assertion that it will be ready to implement the requirements of the DATA Act by May 2017. However, we noted areas of concern that potentially could impact the Department's ability to most effectively meet all the requirements within the requisite timeframe. Specifically, we have concerns regarding the following:

- 1. A full inventory, mapping, and gap analysis is not yet completed for the entire Department;
- 2. The Department has not performed an impact analysis of the Federal Prison Industries' lack of budgetary accounting at the transaction level;
- 3. No Direct/Reimbursable Funding Source indicator is present in the legacy accounting system;
- 4. The current solution for standardized extraction of data is incomplete; and
- 5. The Department plans to use a manual process to capture the Procurement Instrument Identifier for the Financial Management Information System 2 and the Systems, Applications, and Products System.

We performed the attestation review in accordance with attestation standards contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. An attestation review is substantially less in scope than an examination and, therefore, does not result in the expression of an opinion.

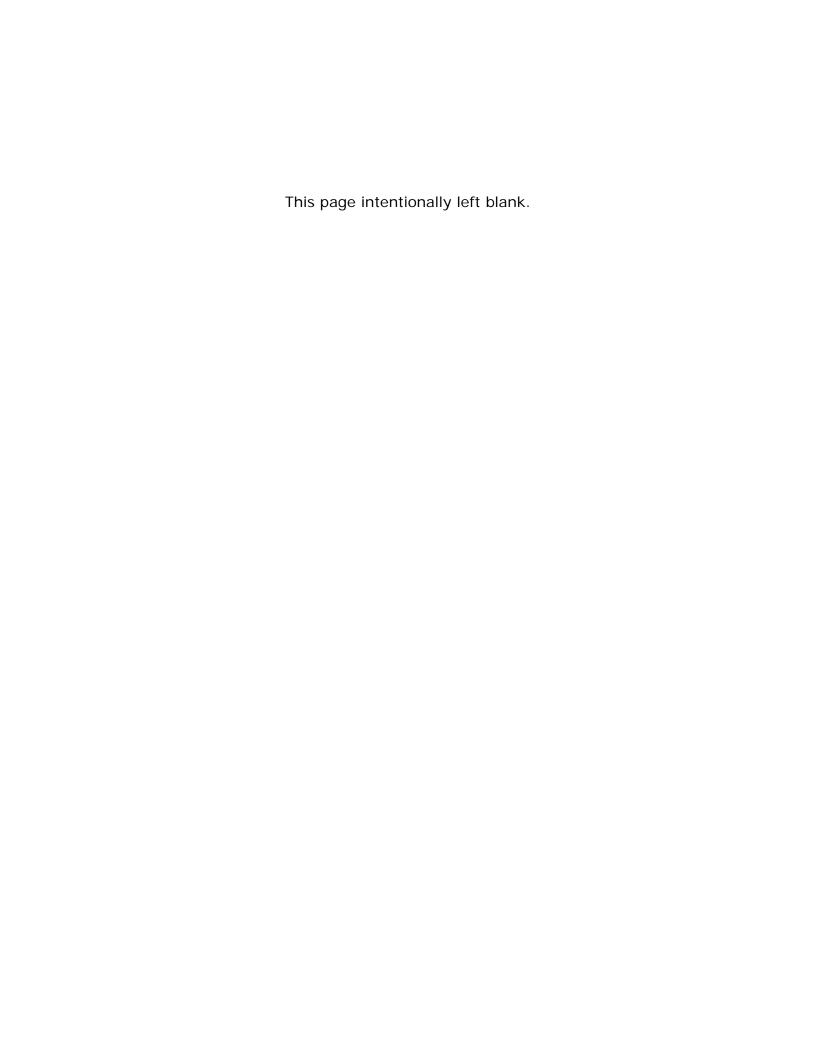


REVIEW OF THE U.S. DEPARTMENT OF JUSTICE'S READINESS TO IMPLEMENT THE DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT OF 2014

TABLE OF CONTENTS

INTRODUCTION

Background	1
OIG Review Approach	2
OFFICE OF THE INSPECTOR GENERAL'S INDEPENDENT REPORT ON THE DEPARTMENT OF JUSTICE'S READINESS TO IMPLEMENT THE DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT OF 2014	5
OIG OBSERVATIONS OF THE DEPARTMENT'S DATA ACT READINESS	
Noted Accomplishments	7
Noted Concerns	8
APPENDIX 1: CIGIE LETTER TO CONGRESS ADDRESSING THE DATA ACT REPORTING DATE ANOMALY	. 11
APPENDIX 2: THE DEPARTMENT'S RESPONSE TO THE OLG'S CONCERNS	13



REVIEW OF THE U.S. DEPARTMENT OF JUSTICE'S READINESS TO IMPLEMENT THE DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT OF 2014

INTRODUCTION

Background

On May 9, 2014, the President of the United States signed into law the *Digital Accountability and Transparency Act of 2014* (DATA Act, P.L. No. 113-101), amending the *Federal Funding Accountability and Transparency Act of 2006* (FFATA, P.L. No. 109-282). The DATA Act amends FFATA by adding new requirements for government-wide spending data standards, full publication of all spending data, and a pilot program to test subaward reporting standards for grant and contract recipients.

The DATA Act requires the Office of Management and Budget (OMB) and the Department of the Treasury (Treasury) to jointly develop by May 9, 2016, government-wide financial data standards for spending information and to publish this spending information for free access and download on the government's USASpending.gov website by May 9, 2017. Additionally, the DATA Act requires OMB and Treasury to issue guidance to federal agencies. In coordination with Treasury, OMB issued memorandum M-15-12, *Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable*, to provide guidance to federal agencies on current reporting requirements pursuant to the FFATA and new requirements that agencies must employ pursuant to the DATA Act.

Further, in accordance with OMB Memorandum M-15-12, agencies were to update their DATA Act Implementation Plans, which outlined the agencies' resource requirements, timelines, and foreseeable challenges. To facilitate agency implementation, Treasury issued guidance to agencies in the *DATA Act Implementation Playbook* (DATA Act Playbook), which was provided to agencies in 2015. The DATA Act Playbook outlines an 8-step plan for successful maintenance of the FFATA requirements and implementation of the DATA Act requirements.

The DATA Act mandates oversight by the Offices of the Inspectors General (OIG) and requires from them a series of oversight reports to include, among other things, an assessment of the completeness, timeliness, quality, and accuracy of data submitted. As stated in the DATA Act, the first set of OIG reports were due to Congress in November 2016. However, this requirement presented a reporting date anomaly because federal agencies are not required to submit spending data in compliance with the DATA Act until May 2017. As a result, the OIGs would not be able to review and report on the spending data submitted under the DATA Act in November 2016, as this data will not exist until the following year.

The Department of Justice Office of the Inspector General (DOJ OIG) is committed to early oversight of the DATA Act implementation. As such, the DOJ OIG worked with its OIG partners through the Council of the Inspectors General on Integrity and Efficiency (CIGIE) to develop an approach to address the reporting date anomaly while maintaining early engagement with the federal agencies. CIGIE recommended a plan to provide Congress with the first required reports in November 2017, 1-year after the due date included in the statute, with subsequent reports in November 2019 and November 2021. CIGIE believes that this schedule will enable the OIGs to meet the intent of the provisions in the DATA Act by providing useful oversight and transparency, as early as possible, to the government's implementation of the Act's requirements.

On December 22, 2015, CIGIE's Chair (who is also the DOJ Inspector General) issued a letter on behalf of CIGIE memorializing the recommended approach for dealing with the OIG reporting date anomaly in the DATA Act and communicated it to the Senate Committee on Homeland Security and Governmental Affairs and the House Committee on Oversight and Government Reform. In the letter, CIGIE also encouraged OIGs to undertake DATA Act "Readiness Reviews" at their respective agencies prior to the November 2017 reporting deadline. This report captures the results of this readiness review at the Department of Justice.

OIG Review Approach

The DOJ OIG performed a review of the Department's DATA Act implementation plan and its progress as of August 31, 2016 in implementing steps 1 through 4 of Treasury's suggested "Agency 8-step plan" in order to evaluate whether the Department appeared to be on track to meet the requirements of FFATA, as amended. Figure 1 shows the suggested Agency 8-step plan. We reviewed the Department's status through step 4 because the implementation of the DATA Act requires an iterative and agile approach, and the Department's initial implementation plan indicated that the majority of the resource requirements would occur between steps 3 and 4. The DOJ OIG will review the remaining steps, including the data submitted pursuant to the DATA Act, in its November 2017 OIG report.

Specifically, our review included the following procedures:

- Obtained an understanding of P.L. Nos. 113-101 and 109-282.
- Obtained an understanding of OMB guidance on the DATA Act.
- Reviewed Treasury's DATA Act Implementation Playbook, Versions 1.0 and 2.0.
- Reviewed the Department's DATA Act Implementation Plans dated September 2015 and August 2016.
- Met with members of the Department's DATA Act Implementation Working Group.

¹ Appendix 1 contains a copy of this letter.

- Obtained an understanding of the Department's governance structure, processes, and controls planned.
- Assessed the Department's readiness to report financial and payment information as required by the DATA Act.

Figure 1 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)

Source: Figure 3: Agency 8-Step Plan of DATA Act Program Management Office, U.S. Department of the Treasury, Bureau of Fiscal Service, DATA Act Implementation Playbook Version 2.0, last updated June 24, 2016.

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Office of the Inspector General

Washington, D.C. 20530

OFFICE OF THE INSPECTOR GENERAL'S INDEPENDENT REPORT ON THE DEPARTMENT OF JUSTICE'S READINESS TO IMPLEMENT THE DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT OF 2014

United States Attorney General U.S. Department of Justice

We have reviewed the Department of Justice's (Department) assertion that it will be ready to implement the requirements of the *Digital Accountability and Transparency Act of 2014* by May 2017. Specifically, we reviewed the Department's implementation plan and its progress as of August 31, 2016 in implementing steps 1 through 4 of Treasury's Agency 8-step Plan in the *DATA Act Implementation Playbook*. The Department's management is responsible for its assertion.

Our review was conducted in accordance with the attestation standards contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. An attestation review is substantially less in scope than an examination, the objective of which would be the expression of an opinion. Accordingly, we do not express such an opinion.

Based on our review, nothing came to our attention that caused us to believe that a material modification should be made to the Department's assertion that it will be ready to implement the requirements of the DATA Act by May 2017. However, we noted areas of concern that potentially could impact the Department's ability to most effectively meet all the requirements within the requisite timeframe. Specifically, we have concerns regarding the following:

- 1. A full inventory, mapping, and gap analysis is not yet completed for the entire Department;
- 2. The Department has not performed an impact analysis of the Federal Prison Industries' lack of budgetary accounting at the transaction level;
- 3. No Direct/Reimbursable Funding Source indicator is present in the legacy accounting system;
- 4. The current solution for standardized extraction of data is incomplete; and
- 5. The Department plans to use a manual process to capture the Procurement Instrument Identifier for the Financial Management Information System 2; and the Systems, Applications, and Products System.

Report on the Department of Justice's Readiness to Implement the Digital Accountability and Transparency Act of 2014
Page 2

This report is intended solely for the information and use of Department management, Treasury, Office of Management and Budget, U.S. Government Accountability Office, and the U.S. Congress, and is not intended to be and should not be used by anyone other than these specified parties.

Kelly A. McFadden, CPA

Kelly A McGadle

Director, Financial Statement Audit Office

Office of the Inspector General

U.S. Department of Justice

December 20, 2016

OIG OBSERVATIONS OF THE DEPARTMENT'S DATA ACT READINESS

We acknowledge the strides the Department has taken to meet the reporting requirement of the DATA Act; however, we also noted areas of concern that potentially could impact the Department's ability to most effectively meet all the requirements of the DATA Act within the requisite timeframe.

Noted Accomplishments

The Department was one of the first federal agencies to establish a plan for the DATA Act governance structure, during a monthly Senior Accountable Official (SAO) call, Treasury asked the Department to present its governance structure as a best practice to other federal agencies. The Department recognized that, in addition to the SAO, there was a need for a Governance Board that would include Data Stewards from each of the Department's components. Each component has a Data Steward for the acquisitions, grants, information technology, budget, and finance process areas and would be responsible for certifying data quality and internal controls from the component-level to the SAO.

The Department again took a leadership role in the government-wide implementation of the DATA Act by actively participating in the data standards development, providing feedback on the DATA Act Information Model Schema (DAIMS), sharing its code for generating File A from the SF 133² with other federal agencies, and partnering with Treasury to lead the Product Control Board Momentum (financial system vendor) working group. The Department DATA Act working group's participation played an instrumental role in encouraging Treasury to directly pull data from various source systems to which Treasury already has access, rather than the agencies pulling information from those systems themselves and resubmitting the information to Treasury manually. This resulted in Treasury and OMB agreeing to and revising the final DAIMS structure to pull data from the Federal Procurement Data System (File D1³) and the Award Submission Portal (File D2⁴), directly into the Treasury DATA Act Broker.

² Reports on Budget Execution and Budgetary Resources

³ File D1 contains award-level procurement data.

⁴ File D2 contains award-level financial assistance data.

Noted Concerns

1. A full inventory, mapping, and gap analysis not yet completed for the entire Department

The Department has three financial systems: (1) the Unified Financial Management System (UFMS); (2) the Financial Management Information System 2 (FMIS2), a legacy financial system; and (3) the Systems, Applications, and Products (SAP) system. ⁵ Each system was to be inventoried to determine if and where the data elements exist on the systems. In fiscal year 2015, the Department completed an initial inventory of the Drug Enforcement Administration's (DEA) procurement information in UFMS and an initial inventory of the Office of Justice Programs' (OJP) grant award information in FMIS2. These initial inventories permitted the Department to team up with Treasury to pilot a submission of procurement and grant award information to Treasury's prototype data broker (DAIMS v0.7)⁶, which allowed for an early understanding of the data broker's design. However, given the Department's larger focus and understanding that Treasury would be redesigning the data broker, the Department delayed completing a full inventory, mapping, and gap analysis for its other components. The Department planned to leverage the knowledge gained in mapping the two major financial systems at DEA and OJP for mapping the remainder of the Department's components, because the mappings of DEA and OJP were believed to be representative of all users for those respective financial systems. However, the Department did not fully foresee the issues that would arise due to the different components' configurations of the financial systems and the inconsistencies in the way that components capture and report financial data. Further, the Department did not anticipate the impact of the delayed release of the DAIMS v1.07 guidance from Treasury. Consequently, as of August 31, 2016, the Department still had not completed this important step. As a result, we have concerns that the completeness, accuracy, and quality of the data may be affected as inventory and mapping of the data elements is a crucial step in identifying data gaps or issues and implementing any necessary changes needed to the systems or business processes.

⁵ The Department's Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Assets Forfeiture Fund (AFF), Drug Enforcement Administration (DEA), Federal Bureau of Investigation (FBI), and U.S. Marshals Service (USMS) use UFMS. The Department's Offices, Boards and Divisions (OBDs), Federal Bureau of Prisons (BOP), and Office of Justice Programs (OJP) use FMIS2, and the Department's Federal Prisons Industries, Inc. (FPI) uses SAP.

⁶ Initial draft of the DATA Act Information Model Schema developed in May 2015.

⁷ Issued April 29, 2016.

2. No impact analysis of FPI's lack of budgetary accounting at the transaction level that may impact the ability to create Files B and C^8

FPI is a government corporation that utilizes a financial management accounting system based on commercial accounting. As such, the FPI's financial management system records transactions on the proprietary-basis of accounting and precludes it from recording budgetary accounting at the transaction level. As of August 31, 2016, the Department had not completed an impact analysis to determine the steps necessary to overcome the gap associated with the FPI's lack of budgetary accounting at the transaction level. Because the DATA Act requires detail of budgetary transactions, an analysis should be completed so that the Department can successfully convert the proprietary accounting information into the required budgetary format for reporting. Although FPI's budgetary resources account for less than 2 percent of the Department's budgetary resources, we have concerns over the completeness of the budgetary information reported for FPI.

3. Direct/Reimbursable Funding Source Indicator for FMIS2

We also have concerns regarding the completeness of the data that will be submitted for those components utilizing FMIS2 to report the required data element of the direct or reimbursable funding source. The Department's legacy accounting system, FMIS2, does not have a mechanism to capture this required data element. The Department has weighed the costs and benefits of investing additional development into FMIS2, and because FMIS2 is slated to be retired by 2020, the Department does not plan to invest the additional funding into the system that would be required to create such a mechanism. While we understand the Department's decision, we will continue to have concerns over the completeness of this information until the UFMS is fully implemented.

9

⁸ File B contains data detailed by Object Class and Program Activity. File C contains award-level financial detail. Along with File A's Appropriations Account summary-level data, these three reporting submission specification files will be submitted to the Treasury DATA Act Broker.

4. Incomplete solution for standardized extraction of data for submission, which resulted in limited testing of broker with actual data

As of August 31, 2016, there is no current solution for standardized extraction of data from all of the Department components' financial systems for submission to the Treasury DATA Act Broker. The Department submitted actual data files for a small Department component to the broker to test usability of the broker, but not to test the data extracted from the component's financial system. The test data was taken from the financial system and manually reconfigured to be consistent with the reporting requirements. This was possible for the Department to accomplish with a small component; however, manual reconfiguration of the data for all components could be risky. As communicated to OMB in its implementation plan, the Department has plans to develop a solution by January 2017 with testing to be completed by early March 2017. However, we have concerns that the timeline will not allow for any delays or setbacks in order for it to be in a position to meet the mandatory submission in May 2017.

5. Manual process to capture PIID for FMIS2 and SAP

Finally, we have concerns regarding the data element linkage between data from two of the Department's financial systems and data from the Federal Procurement Data System, which is accomplished through the use of the Procurement Instrument Identifier (PIID), because the PIID is not captured in FMIS2 and SAP. The linkage between systems is significant as this is the foundation of the DATA Act. As of August 31, 2016, the Department plans to capture the PIID manually, but specific processes to do this had not yet been developed or tested. Our concern is that any manual process involving a voluminous amount of transactions is time consuming and inefficient, and would also have an inherent high risk for errors.

⁹ The Procurement Instrument Identifier (PIID) is required by OMB Memorandum M-15-12, Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable and OMB Management Procedures Memorandum 2016-03, Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information.

CIGIE LETTER TO CONGRESS ADDRESSING THE DATA ACT REPORTING DATE ANOMALY



December 22, 2015

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

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

Dear Mr. Chairmen and Ranking Members:

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

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

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

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Page 2

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

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

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

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

Sincerely,

Michael E. Horowitz

Chair, Council of the Inspectors General on Integrity and Efficiency

Inspector General, U.S. Department of Justice

cc: The Honorable David Mader, Controller, OMB

The Honorable Gene Dodaro, Comptroller General, GAO

THE DEPARTMENT'S RESPONSE TO THE OIG CONCERNS



U.S. Department of Justice

Washington, D.C. 20530

DEC 1 9 7016

MEMORANDUM FOR JASON R. MALMSTROM

ASSISTANT INSPECTOR GENERAL FOR AUDIT OFFICE OF THE INSPECTOR GENERAL

FROM:

Assistant Attorney General for Administration

SUBJECT: Response to Concerns contained in the Office of the Inspector General's Draft Report:

Review of the U.S. Department of Justice's Readiness to Implement DATA Act of

2014

This responds to the Office of the Inspector General (OIG) draft report: Review of the U.S. Department of Justice's Readiness to Implement DATA Act of 2014. We are pleased that the report states the various accomplishments we have made as of the date of this review and agree with the concerns expressed by the OIG as of August 31, 2016. We have made substantial strides to address these concerns over the last few months. The Department is in frequent communication with the Department of Treasury (Treasury) and the Office of Management and Budget (OMB), and we have identified the Department's risks and progress in our monthly implementation plan updates as well as in Departmental Senior Leadership meetings.

The Department of Justice has reviewed the draft OIG report and provides the following responses to the OIG's five concerns.

Concern 1: A full inventory, mapping, and gap analysis is not yet completed for the entire Department.

Response: Since the date of the review, the Department has continued to perform inventory, mapping, and gap analysis for all components. The United States Marshals Service (USMS) has completed their mapping and gap analysis for the Unified Financial Management System (UFMS). The USMS identified workarounds for Procurement Instrument Identifier PIID gaps and have shared these solutions with other components, as well as other Federal Agencies. The initial mappings

performed by the Office of Justice Programs (OJP) and the Drug Enforcement Administration (DEA) have proved helpful for other components despite the changes in requirements from Treasury. The Department is performing mappings and gap analysis for Offices, Boards and Division (OBDs) on the Financial Management Information System 2 (FMIS2) and UFMS, as well as the Federal Bureau of Prisons on FMIS2. DEA shared their code for generating the Object Class and Program Activity file (File B) and the Award Financial file (File C) with all components, including Federal Bureau of Investigation (FBI), Alcohol, Tobacco, Firearms, and Explosives (ATF) and USMS for their use as they work towards compiling the files. The Department believes we have identified all major gaps and issues and are actively working to implement solutions. While there is no mandated deadline for these important steps prior to the compliance timeline of April 30, 2017 based upon the Treasury Playbook, we are actively performing these actions as we test and we anticipate completion by the end of January 2017.

Concern 2: The Department has not performed an impact analysis of the Federal Prison Industries' (FPI) lack of budgetary accounting at the transaction level.

Response: The Department has created a Departmental consolidated File A - Appropriations Account Detail, which includes all (proprietary and budgetary) general ledger accounts, including FPI. While FPI currently produces the required information for File B - Object Class and Program Activity Detail on an annual basis, we are working with FPI to crosswalk the Government wide Treasury Account Symbol Adjusted Trial Balance System (GTAS) data to File B for quarterly submission. We aim to have a complete File B for all components by January to begin consolidated testing. We met with the procurement staff for FPI and they feel comfortable that they can produce a File C - Award and Financial Detail using a combination of Federal Procurement Data System (FPDS) and financial system data in the required timeframe.

Concern 3: No Direct/Reimbursable Funding Source indicator is present in the legacy accounting system.

Response: While we agree with this concern, we are taking every measure to reduce the amount of inaccurate reporting for our legacy system as it relates to Direct/Reimbursable (D/R). Furthermore, not every Treasury Account Symbol (TAS) has a split between D/R, so the impact is not all encompassing. We have communicated with Treasury and OMB that we plan to default to Direct where the D/R code is not available as an interim measure while the Department continues to migrate remaining components off our legacy accounting system.

Concern 4: The current solution for standardization extraction of data is incomplete.

Response: The Department has a standardized solution for File A. We developed a program to transform the consolidated GTAS data into a Department-wide File A. All components validated File A for Quarter 3 and are in the process of validating Quarter 4. This code was made available to all Federal Agencies for their perusal. Further, DEA, USMS, and OJP are finishing testing for Files B and C. We anticipate the additional components will complete testing by the January timeframe. Once testing has been completed, then the standardized extraction process can be completed. The Department is developing a temporary solution for consolidating component submissions into a Department file for Files B and C that will utilize the current WebFocus platform. This solution is

temporary until the overall Governance solution is developed, which we understand is expected to be in production for the May 2017 submission.

Concern 5: The Department plans to use a manual process to capture the Procurement Instrument Identifier (PIID) for the legacy accounting system.

Response: The Department is exploring methodologies that would reduce the manual effort we previously discussed at the time of the OIG's review for capturing the PIID in our legacy accounting system. We agree with this concern and we are addressing it via two steps. Initially, we are performing a manual data call. However, moving forward for Quarter 3, 2017 reporting, we will collect the FMIS2 document number (YREGDOC) in the description field of FPDS and electronically match it back to the corresponding obligation in FMIS2. We are currently working with OBDs' and JMD Procurement Services Staff to update the manual for data entry into FPDS.

The Department of Justice Office of the Inspector General (DOJ OIG) is a statutorily created independent entity whose mission is to detect and deter waste, fraud, abuse, and misconduct in the Department of Justice, and to promote economy and efficiency in the Department's operations. Information may be reported to the DOJ OIG's hotline at www.justice.gov/oig/hotline or (800) 869-4499.



Office of the Inspector General U.S. Department of Justice www.justice.gov/oig