U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF INSPECTOR GENERAL

DATA Act: Report on DOT's Submission

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DATA Act: Report on DOT's Submission

Required by the Digital Accountability and Transparency Act of 2014

Office of the Secretary | FI2018018 | January 29, 2018

What We Looked At

The Digital Accountability and Transparency Act of 2014 (DATA Act) reinforces Federal agencies' compliance with the Federal Funding Accountability and Transparency Act of 2006, which requires that Federal agencies maintain reliable data on spending and financial assistance. The Department of the Treasury makes these data available to the public at USASpending.gov. The DATA Act requires that every 2 years through 2021, inspectors general assess their agencies' data submissions. Accordingly, our audit objectives were to assess (1) the completeness, timeliness, quality, and accuracy of DOT's fiscal year 2017, second quarter financial and award data submitted for publication on USASpending.gov and (2) the Department's implementation and use of the governmentwide financial data standards established by OMB and Treasury.

What We Found

DOT's submission was timely and almost complete but we could not assess its accuracy because we could not rely on data in Treasury's data collection system and other external systems. Furthermore, we could not assess the submission's quality because the guide on submission reviews requires that quality be assessed by considering accuracy in addition to completeness, timeliness, and internal control. While DOT's submission was nearly complete, FHWA and FAA officials informed us that their submissions omitted certain transactions. Lastly, our assessment of internal control did not reveal any issues that were significant to our audit.

The Department implemented and used the data standards, and the OAs used the data elements as required. DOT's Office of the Secretary provided feedback to Treasury and OMB throughout the drafting and issuing of the Standards' definitions. By understanding and using the Standards, DOT reduces the risk of errors and increases the likelihood that the reports will be timely, complete and accurate.

Our Recommendations

We made three recommendations to help DOT improve its data submissions under the act. DOT concurred with all three recommendations.

Contents

Memorandum

Date: January 29, 2018

Subject: INFORMATION: DATA Act: Report on DOT's Submission | Report No. FI2018018

From: Louis C. King
            Assistant Inspector General for Financial and Information Technology Audits

To: Assistant Secretary for Budget and Programs/Chief Financial Officer

The Department of Transportation (DOT)—the second largest grant-making entity in the Federal Government—passes 75 percent of its budget as grants to States, localities, research institutions, and individuals. These grants go to support various programs designed to ensure safe, fast, and efficient transportation in the United States. In 2014, Congress passed the Digital Accountability and Transparency Act of 2014[1] (DATA Act) to reinforce Federal agencies' compliance with the Federal Funding Accountability and Transparency Act of 2006[2] (FFATA). FFATA requires that Federal agencies maintain transparent and reliable information on spending and financial assistance. The Department of the Treasury (Treasury) makes this information available to the public at USASpending.gov.

The DATA Act requires that every 2 years through 2021, inspectors general conduct assessments of the data that their agencies submit to USASpending.gov and to report to Congress on these assessments. The act required that the first of these reports be submitted in November 2016. However, because the data was not available to test in 2016, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) proposed that inspectors general first report[3] on their agencies' readiness for implementation of the act in November 2016, and then report on the first data assessment by November 2017.

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[1] Pub. L. No. 113-101.

[2] Pub. L. No. 109-282.

[3] We issued a report on our assessment of DOT's DATA Act implementation efforts, *DOT's DATA Act Readiness: The Department is on Schedule to Meet the May 2017 Reporting Deadline* (OIG Report Number FI-2017-005), November 4, 2016.

Accordingly, our audit objectives were to assess (1) the completeness, timeliness, quality, and accuracy of the Department's fiscal year 2017, second quarter financial and award data submitted for publication on USASpending.gov and (2) the Department's implementation and use of the governmentwide financial data standards established by the Office of Management and Budget (OMB) and Treasury.

We conducted this review in accordance with generally accepted Government auditing standards. To conduct our work, we reviewed legislation, applicable criteria and guidance related to the Department's responsibilities to report financial and award data under the DATA Act, and other documentation. As part of this audit, we selected a statistical sample of 385 out of 10,687 transactions. CIGIE, in consultation with the Government Accountability Office (GAO), developed a governmentwide sampling methodology using an expected error rate of 50 percent[4] for the first data submission. We also interviewed Department and Enterprise Services Center[5] (ESC) personnel. Exhibit A details our scope and methodology. Exhibit B presents a flow chart of DATA Act information. Exhibit C lists the entities we visited or contacted.

We appreciate the courtesies and cooperation of Department of Transportation representatives during this audit. If you have any questions concerning this report, please call Louis C. King, Assistant Inspector General for Financial and Information Technology Audits, at (202) 366-1407.

cc: The Secretary
        DOT Audit Liaison, M-1

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[4] A precision rate of + or – 5 percent at the 95 percent confidence level.
[5] ESC—a shared Federal services provider—is a division of DOT that provides financial management and information technology support services for Federal agency customers. As a shared services provider, ESC is required to report information in accordance with the DATA Act on behalf of the Department and its other customers.

Background

The FFATA requires agencies to report Federal awards of $25,000 and more to USASpending.gov. The DATA Act expands the FFATA by requiring that Federal agencies disclose direct expenditures,[6] and link their contract, loan, and grant spending to their programs.

The DATA Act also requires that beginning in May 2017, all Federal agencies report financial and award data in accordance with the Federal Spending Transparency Data Standards (the Standards). These standards—developed by Treasury and OMB—consist of 57 defined data elements for financial data related to agency account-level reporting and award reporting in accordance with FFATA. All Federal agencies must use these elements to report their data. The Standards are intended to help taxpayers and policy makers understand how Federal agencies spend taxpayer dollars, and improve agencies' spending oversight and data-centric decision-making.

The Department's Operating Administrations (OA) report their financial, non-financial and procurement data to multiple internal systems, such as Delphi,[7] the Procurement Information System for Management (PRISM),[8] and the Federal Aviation Administration's (FAA) PRISM. Federal law[9] requires all Federal agencies to also report these same data to two external databases that maintain governmentwide data—the Award Submission Portal (ASP)[10] and the Federal Procurement Data System-Next Generation (FPDS-NG). Furthermore, Federal award recipients are required to report their entity data and sub-award and executive compensation data in two other systems—the System for Award Management (SAM) and the FFATA Sub-award Reporting System (FSRS). Each award in these databases, except SAM, has an identifier according to the type of award transaction. A procurement instrument identifier identifies each procurement transaction and a Federal award identification number identifies each financial transaction.

As a shared Federal services provider, ESC maintains Delphi and PRISM, and prepares the Department's data submissions.[11] To prepare a submission, ESC draws OA data for the reporting period from Delphi according to the Standards

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[6] Direct expenditures are all expenditures other than those from one Federal agency to another.
[7] Delphi is DOT's financial management system.
[8] PRISM is a purchasing management system that tracks all procurement phases—requisition, award, and close-out—and integrates with Delphi.
[9] FFATA and Federal Acquisition Regulation, Section 4, Subpart 4.6, Contract Reporting and Award System.
[10] In September 2017, ASP was replaced by the Financial Assistance Broker Submission.
[11] Except for the Saint Lawrence Seaway Development Corp. (SLSDC) which uses the data systems maintained by the Interior Business Center (IBC), another Federal shared service provider.

established by Treasury and OMB. ESC then generates three data files. File A contains appropriation summary level data that are aligned to the reporting on Standard Form (SF) 133.[12] File B includes obligation and outlay information at the program activity[13] and object class levels.[14] File C contains obligation information at the award and object class level. ESC then uploads the files to a system maintained by Treasury, known as the Broker. The Broker reviews the files according to DATA Act reporting submission specifications, and generates a warning report for each file that contains errors. The OAs resolve any fatal errors[15] identified in the warning reports, and ESC regenerates and uploads the files to the Broker until the Broker validates that the files are free of fatal errors.

When no fatal errors exist in files A, B, and C, ESC generates files D1 and D2 in the Broker. File D1 contains data from FPDS-NG on procurement awards, award programs, and awardees and contractors, including demographic information such as performance locations and addresses, and identifying numbers. File D2 contains similar data on financial assistance awardees from ASP. The Broker then cross-validates the data, for example, between file A and file B, between file B and file C, and between file C and files D1 and D2. The OAs resolve any fatal errors identified during the cross-validation, and ESC regenerates files A, B, and C and uploads them again to the Broker. Once the Broker confirms that the files contain no fatal errors, ESC generates a consolidated warning report that details all of the OAs' validations and cross-file validations. The OAs then certify their data by signing a quarterly certification document, which the Office of Financial Management (OFM) and the Office of the Senior Procurement Executive (OSPE) then review, and the OAs answer any questions that OFM or OSPE may have. Once all questions are answered, OFM and OSPE coordinate with DOT's senior accountable official (SAO) to prepare the DOT's submission.

Concurrently, ESC produces, uploads, and validates a consolidated set of departmentwide files A, B, and C. Then ESC generates departmentwide files D1 and D2 and cross-validates the departmentwide files in the Broker. Once the Broker confirms that no fatal errors exist, ESC generates a consolidated warnings report detailing all departmentwide file validations and cross-file validations, as well as a chart that summarizes the number of warnings by validation rule for the SAO to review. The ESC then generates file E, which contains data from SAM on the five most highly compensated officers and file F, which contains data from FSRS on sub-awards, in the Broker. ESC then notifies the SAO that the DOT quarterly submission is ready to be certified and submitted.

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[12] SF-133 is used to report on agencies' budgetary execution and resources.
[13] Activities and projects listed in the program and financing schedules of the Federal Government's annual budget.
[14] Categories in a classification system that presents obligations by items or services purchased by the Federal Government.
[15] A submission with fatal errors cannot be accepted by the Broker; however, regular warning errors can be accepted by the Broker.

The SAO provides comments in the Broker, as needed, to clarify the Department's submission and certifies the final, consolidated DOT submission. Treasury then publishes the data to USASpending.gov.

The Federal Audit Executive Council (FAEC) developed a review guide[16] for inspectors general to use in the reviews of their agencies' data submissions. This guidance covers how to evaluate completeness, timeliness, quality, and accuracy of the submissions.

Results in Brief

While DOT's submission was timely and almost complete, we could not assess the accuracy and overall quality of Department's data submission due to limitations in external systems outside of DOT's control.

Based on our sample of 385 transactions, we estimate that 81.6 percent were complete[17] and 96.6 percent timely.[18] However, we could not assess the submission's accuracy because we could not rely on data in the Broker and other external systems. Furthermore, we could not assess the submission's quality because the review guide requires that quality be assessed by considering accuracy in addition to completeness, timeliness, and internal control. While DOT's submission was nearly complete, officials from the Federal Highway Administration (FHWA) and FAA stated their file C submissions omitted some transactions. For example, FHWA was still determining whether several transactions, including lease and utility obligations, were reportable. Although it has reached some determinations, others are pending. Lastly, our assessment of internal control did not reveal any issues that were significant to our audit. The limitations involving external systems outside of DOT's control preclude our ability to assess the quality of the Department's DATA Act submissions.

The Department implemented and used the data standards.

Based on our testing, we found that the OAs used the data elements as required. DOT's Office of the Secretary (OST) provided significant feedback to Treasury and OMB throughout the course of the drafting and issuing of the Standards' definitions. By understanding and using the Standards, DOT reduces the risk of

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[16] Department of Treasury Office of Inspector General, *Inspectors General Guide to Compliance Under the DATA Act* (OIG-CA-17-012), February 27, 2017.
[17] Our 81.6 percent estimate has a precision of +/-3.8 percentage points at the 95 percent confidence level.
[18] Our 96.6 percent estimate has a precision of +/-1.8 percentage points at the 95 percent confidence level.

errors and increases the likelihood that the reports will be timely, complete and accurate.

We are making three recommendations to help DOT improve its DATA Act data submissions.

DOT's Submission Was Timely and Nearly Complete but We Could Not Assess Accuracy or Overall Quality Due to Limitations in External Systems Outside of DOT's Control

The Department's submission contained the majority of the required records and transactions that had been reported in a timely manner. However, due to issues with data in the Broker, we could not assess accuracy or draw a conclusion regarding the submission's overall quality. Lastly, we did not come across any relevant internal control deficiencies in DOT systems.

The Department's Submission Contained the Majority of Required Records

DOT's submission was more than 80 percent complete. Based on our statistical sample, we estimate that 81.6[19] percent of the records were complete.

According to the review guide, agencies should measure submissions' completeness by determining the following:

- Whether all transactions that should have been recorded were recorded in the proper reporting period; and

- The percentage of transactions containing all applicable data elements required by the DATA Act.

However, the review guide does not state a percentage above which a submission is to be considered complete.

In our review of the data submission's completeness, we found 71 transactions in our sample of 385 that we could not trace from file C to files D1 and D2,

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[19] With a precision of +/-3.8 percentage points at the 95 percent confidence level.

indicating that at least one of these files was not complete. We could not find some of these transactions because the OAs reported the information to ASP and FPDS-NG in one quarter, but ESC did not process it in Delphi until a subsequent quarter. ESC also processed certain transactions from FAA in Delphi prior to FAA's reporting those transactions into FPDS-NG. Lastly, some transactions that were not reportable for DATA Act purposes were erroneously flagged in Delphi as DATA Act reportable; these transactions were in file C but not in FPDS-NG.

We also found the following transactions in our sample that should not have been included in DOT's submission:

- SLSDC transactions involving invoices that netted to zero. Treasury guidance on the Broker website states that these transactions should be excluded. An SLSDC official informed us that these transactions were invoices that its shared service provider, IBC, should have excluded from file C. The SLSDC official further noted that Oracle, the system's developer, knows about the improper inclusion of these invoices and is developing a solution.

- FAA reported some micro-purchases[20] and some non-reportable lease transactions.

We also found errors and potential errors in data outside of our sample from FAA and FHWA respectively. FAA did not report to FPDS-NG, several transactions classified as other transaction agreements (OTA).[21] FAA's policy is to not report OTA activity to FPDS-NG—even if it exceeds FFATA's $25,000 threshold. FAA officials stated that the Administration's policy is based on General Services Administration (GSA) policy and that no additional guidance requiring a change in FAA's policy has been issued since it adopted GSA's policy. However, FAA's practice of not reporting on OTA transactions hinders the public's ability to access and track the Department's complete spending information. Based on another recent audit, we recommended[22] that FAA develop and implement policies to report OTA awards that involve Federal funds to USAspending.gov. FAA concurred with this recommendation.

FHWA officials informed us that the Agency's file C data submissions omitted the following transactions:

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[20] The acquisition of supplies or services using simplified acquisition procedures, with a total value of $3,500 or less.
[21] An OTA is an instrument that gives agencies flexibility to achieve mission goals because it is generally exempt from Federal laws and regulations governing acquisitions and financial assistance.
[22] In our report (*DOT and FAA Lack Adequate Controls Over Their Use and Management of Other Transaction Agreements* (OIG Report No. ZA2017098), September 11, 2017), we identify FAA's lack of reporting to USAspending.gov on OTAs.

- **Lease and utility obligations.** At the time of its submission, FHWA was determining whether these transactions were reportable. The Agency has since determined that the leases are not reportable but is waiting for DOT's decision regarding whether the utility obligations are reportable.

- **Type E transactions.**[23] These transactions were missing from the quarter we reviewed. FHWA determined these transactions were reportable after and started reporting them in the third quarter of fiscal year 2017.

- **Treasury's ASP.** At the time of submission, ASP only accepted information on current, active congressional districts. We could not validate award transactions affected by redistricting.

- **Data Universal Numbering System (DUNS).**[24] The DUNS numbers for certain awardees that had expired registrations in SAM were deactivated in ASP at the time of the first required DATA Act submission. DOT's affected awardees have renewed their registrations but the Department was not able to report these transactions until Treasury updated ASP to recognize the reactivated DUNS.

Transactions that should be reported but are not limit the public's ability to view accurate DOT spending data.

DOT Reported Transactions in a Timely Manner

The Department reported transactions in a timely manner. Based on our statistical sample, we estimate that 96.6 percent[25] of the transactions in the Department's submission were reported in a timely manner. The review guide states that transactions are timely if reported within 30 days after the quarter in which they occurred. Reporting data on time increases the utility of USASpending.gov and the transparency of DOT spending.

In our sample of 385 transactions, we identified 13 that had not been timely reported. Eight of these 13 were reported to FPDS and ASP in the first quarter of fiscal year 2017 but not processed in Delphi until the second quarter. ESC officials informed us that sometimes OAs report data within the last day or so of the month and ESC cannot always process them before the beginning of the next month. When the end of the month is also the end of the quarter, those

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[23] A reimbursable transaction—identified by an E in its purchase order number—that the Office of Federal Lands Highway (FLH) uses to engage with non-Federal entities such as States, counties, municipalities and Indian tribes.
[24] A unique 9-digit identification number for each of business' physical locations.
[25] Our estimate has a precision of +/-1.8 percentage points at the 95 percent confidence level.

transactions may become part of the subsequent quarter's data submission. Because of these timing issues, some first quarter transactions were actually reported in the second quarter data submission. The other five untimely reported transactions involved accrued transactions that were not reversed prior to the date of submission as they should have been.

We Could Not Assess Accuracy or Overall Quality Due to Limitations in External Systems Outside of DOT's Control

We were unable to assess the accuracy or overall quality of DOT's submission. On October 10, 2017, we received from the CIGIE FAEC Working Group its *Recommended DATA Act Considerations and Standard Reporting Language*. This document notes that:

- Issues with how some data elements are reported to the Broker for uploading to USAspending.gov impact error rate calculations.

- In their reports, IGs should state that they did not assess the completeness, accuracy, timeliness, and quality of the data extracted from SAM and FSRS by the Broker.

- Causes for certain errors in data at USASpending.gov could not be identified, but evidence suggests that they may be related to the Broker.

Because our testing relied on these external systems to assess the accuracy of DOT's submissions, we cannot reach a conclusion on DOT's accuracy. Furthermore, we are concerned that any additional work to test accuracy using these external systems may not provide meaningful results.

The review guide states that quality should consider the testing results for the completeness, timeliness, internal control, and accuracy to perform our assessment of quality. Because we unable to assess accuracy, we were unable to draw a conclusion regarding the quality of DOT's submission.

We Did Not Identify Any Internal Control Weaknesses

Nothing came to our attention during our review that would lead us to believe that the internal control over DOT's DATA Act processes did not conform to applicable standards. ESC's independent auditor concluded that in all material respects, the controls were suitably designed and operated effectively to provide

reasonable assurance that the control objectives were achieved throughout the period October 1, 2016 through June 30, 2017. For SLSDC, IBC's independent auditor also concluded that in all material respects, IBC's controls were suitably designed and operated effectively to provide reasonable assurance that the control objectives were achieved throughout the period July 1, 2016 through July 31, 2017. In addition to the controls over the Department's source systems for DATA Act reporting, Delphi and PRISM, we also reviewed the five components of internal control over the data management and reporting processes for the Department and ESC, in accordance with the GAO's *Standards for Internal Control in the Federal Government.*[26] See table 1 for details on DOT's controls and table 2 for details on ESC's controls.

Table 1. DOT's Five Components of Internal Control

Control Component	Description
Control Environment	The Department established a DATA Act Working Group comprised of representatives from OST, all DOT OAs, and ESC. The SAO is responsible for implementation of the DATA Act. DOT established the DATA Act Project Management Office (PMO) to coordinate activities and communications across the business, functional, and IT communities.
Risk Assessment	The DATA Act Working Group identified gaps and worked on developing solutions to address insufficiencies, developed options to address gaps in the completeness and accuracy of DATA Act elements, analyzed associated risks and assumptions, and identified solutions.
Control Activities	DOT has procurement, financial assistance, and financial management reporting policies and procedures to ensure its data reporting process complies with the DATA Act requirements.
Information and Communications	The PMO is comprised of representatives from the Office of the Chief Financial Officer including budget and finance, Office of the Chief Information Officer, Office of the Senior Procurement Executive Officer, and ESC. This team is the oversight body responsible for providing project status information to the SAO and executive leadership, and guidance to the DATA Act Team and Working Groups.
Monitoring	The PMO monitors the DATA Act reporting process by meeting with OAs and ESC biweekly to discuss general topics and issues, and by reviewing departmentwide validation errors. The PMO also works with SLSDC and its shared service provider, IBC, since SLSDC's data is combined with the rest of the Department.

Source: OIG analysis.

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[26] GAO, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014.

Table 2. ESC's Five Components of Internal Control

Control Component	Description
Control Environment	ESC formed a DATA Act team with functional, technical, and operations team members. ESC defined its roles and responsibilities and those of its customers.
Risk Assessment	ESC identified risks impacting the DATA Act reporting process and developed action plans to mitigate those risks.
Control Activities	ESC developed policies and procedures for the DATA Act reporting process. It also has data reconciliation and error report review processes in place.
Information and Communications	ESC has communicated and collaborated with the DATA Act PMOs at OMB, Treasury, and DOT, DOT's DATA Act Working Group, and its other Federal agency customers. ESC participates in DOT's biweekly status meetings, but also meets with Department personnel as needed.
Monitoring	In line with DOT, ESC monitors the DATA Act reporting process by meeting with the OAs and DOT's DATA Act PMO biweekly to discuss general topics and issues, and by reviewing departmentwide validation errors.

Source: OIG analysis.

The Department Implemented and Used the Data Standards

The Department properly implemented the Standards. Based on our testing, we found that files A, B and C used the data elements that the standards required. In addition, the Department participated with OMB and Treasury in the data element standardization process. DOT's Office of the Secretary provided significant feedback to Treasury and OMB throughout the course of the drafting and issuing of the data standard definitions. The Department has an understanding of how the 57 data elements are defined and how they relate to its business operations, IT systems, and OAs. By understanding and using the Standards, DOT reduces the risk of errors and increases the likelihood that its submissions will be timely, complete and accurate.

Conclusion

The DATA Act is meant to improve the quality of Federal spending information for the U.S. public. Since we reported on DOT's readiness to meet the act's requirements, DOT made its first submission under the act. DOT delivered its submission in a timely manner and included data that was both timely and significantly complete. However, due to limitations of Treasury's Broker and other external systems, we were unable to assess accuracy of the submission and overall quality. Until these external systems become more reliable, we will be unable to assess the quality of DOT's data reported to USAspending.gov in an efficient, cost-beneficial manner.

Recommendations

We recommend that Assistant Secretary for Budget and Programs/Chief Financial Officer:

1. Determine whether utility obligations are reportable for DATA Act purposes.

2. Improve controls to ensure that SLSDC excludes its zero dollar invoice related transactions from submissions.

3. Improve controls to ensure that FAA excludes micro- purchases from submissions.

Agency Comments and OIG Response

We provided DOT with our draft report on December 13, 2017, and received its formal response on January 12, 2018. DOT's response is included in its entirety as an appendix to this report. DOT concurred with our three recommendations as written and provided dates for the completion of those actions.

Actions Required

We consider our three recommendations resolved but open pending completion of the planned actions.

Exhibit A. Scope and Methodology

We conducted this performance audit between March 2017 and December 2017 in accordance with generally accepted Government auditing standards as prescribed by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The scope of our audit is fiscal year 2017, second quarter financial and award data submitted by the Department for publication on beta.usaspending.gov and applicable procedures, certifications, documentation, and controls to achieve this DATA Act requirement.

To accomplish our objectives, we reviewed the laws, legislation, directives, and any other regulatory criteria and guidance related to the Department's responsibilities to report financial and award data under the DATA Act. We interviewed the Department and ESC personnel to identify any changes in the roles and responsibilities of key personnel involved with the DATA Act reporting since the DOT OIG's DATA Act Readiness Review was issued in November 2016. We also obtained updates about DATA Act implementation activities that have occurred and challenges experienced by the Department and ESC since the Readiness Review was issued. In addition, we conducted interviews with individual OAs and discussed any OA-specific issues and challenges identified during the DATA Act implementation.

We assessed the internal controls over the Department's primary source systems for DATA Act reporting, Delphi and PRISM, as well as other processes, systems, and controls in place to manage and report its fiscal year 2017, second quarter financial and award data under the DATA Act. To accomplish this, we reviewed various reports such as the ESC's fiscal year 2017 Statement on Standards for Attestation Engagements (SSAE) 18[27] and fiscal year 2016 SSAE 16.[28] We interviewed the Department and ESC personnel; and we applied procedures to identify internal control gaps, as necessary. We also reviewed the Department of Interior's *Review of DATA Act Internal Controls for the U.S. Department of the*

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[27] *Quality Control Review of the Controls over DOT's Enterprise Services Center* (OIG Report No. QC2017074), August 30, 2017.
[28] *Quality Control Review of the Controls over DOT's Enterprise Services Center* (OIG Report No. QC2016096), August 31, 2016.

Interior, Interior Business Center, for the Second Quarter of FY 2017[29] because SLSDC is a customer of IBC.

We reviewed a statistical sample of the Department's financial and award data submitted to the Broker for publication on beta.usaspending.gov. CIGIE, in consultation with GAO, developed a governmentwide sampling methodology using an expected error rate of fifty percent (+ or – 5 percent precision at the 95 percent confidence level) for the first data submission. Our sample consisted of 385 from the universe of 10,687 file C transactions that the Department submitted. Our sample size was designed to achieve estimates with 95 percent confidence and a precision no greater than +/-5 percent. We performed multi-purpose testing on the selected transactions to assess the completeness, timeliness, quality, and accuracy of the data sampled and the Department's implementation and use of the governmentwide data standards.

We performed the data reliability assessment on Delphi, which is a primary database used in our sample testing, using our Data Reliability Guidance and Checklist. Based on our review, we determined that the data is reliable.

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[29] DOI, *Review of DATA Act Internal Controls for the U.S. Department of the Interior, Interior Business Center, for the Second Quarter of FY 2017* (Report No. 2017-FIN-038A), August 21, 2017

Exhibit B. DATA Act Information Flow
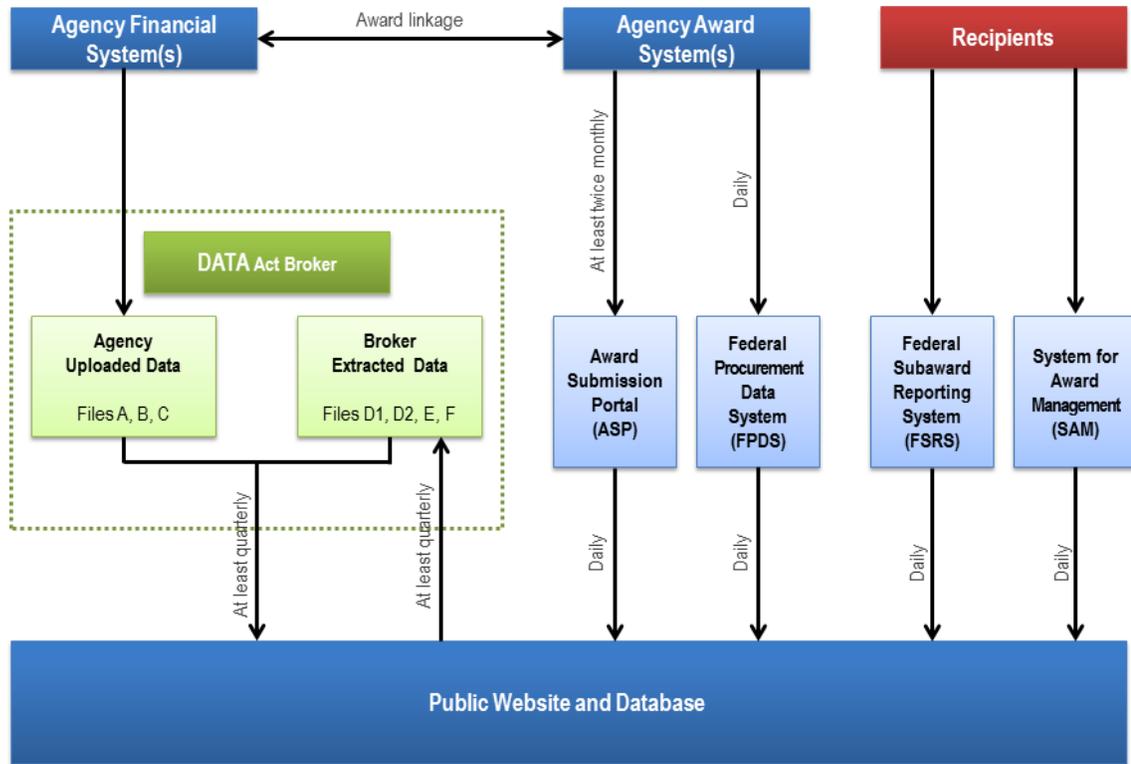
Source: DATA Act Information Model Schema v1.1, released June 30, 2017.

Exhibit C. Organizations Visited or Contacted

Operating Administrations

FAA

FHWA

FMCSA

FRA

FTA

MARAD

NHTSA

PHMSA

SLSDC

Other DOT Organizations

OST

OIG

ESC

Other Organizations

Surface Transportation Board

Exhibit C. Organizations Visited or Contacted   16

Exhibit D. List of Acronyms

ASP	Award Submission Portal
CIGIE	Council of the Inspectors General on Integrity and Efficiency
DATA Act	Digital Accountability and Transparency Act of 2014
DOT	Department of Transportation
DUNS	Data Universal Numbering System
ESC	Enterprise Services Center
FAA	Federal Aviation Administration
FAEC	Federal Audit Executive Council
FFATA	Federal Funding Accountability and Transparency Act
FHWA	Federal Highway Administration
FPDS-NG	Federal Procurement Data System-Next Generation
FSRS	FFATA Sub-Award Reporting System
GAO	Government Accountability Office
GSA	General Services Administration
IBC	Interior Business Center
OA	Operating Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
OSPE	Office of the Senior Procurement Executive
OST	Office of the Secretary
OTA	other transaction agreement
PMO	Project Management Office
PRISM	Procurement Information System for Management
SAM	System for Award Management
SAO	senior accountable official
SLSDC	Saint Lawrence Seaway Development Corporation

Exhibit E. Major Contributors to This Report

GEORGE **BANKS**	PROGRAM DIRECTOR
SHIRELL **BUTCHER**	PROJECT MANAGER
ADDISON **LEE**	AUDITOR
SANJAY **DUGGAL**	MANAGEMENT ANALYST
ZACHARY **SCOTT**	AUDITOR
T. WAYNE **SUMMERS**	AUDITOR
SUSAN **NEILL**	WRITER/EDITOR
PETRA **SWARTZLANDER**	SENIOR STATISTICIAN
MAKESI **ORMOND**	STATISTICIAN
WILLIAM E. **SAVAGE**	IT SPECIALIST

Appendix. Agency Comments

U.S. Department of
Transportation

Office of the Secretary
of Transportation

Memorandum

Subject: Management Response to Fiscal Year 2017 DATA Act Implementation Audit
Report

From: Jennifer Funk
DOT DATA Act Senior Accountable Official

To: Louis King
Assistant Inspector General for Financial and Information Technology Audits

The Department of Transportation (DOT) worked extensively over the past three years to
implement the reporting requirements of the Digital Accountability and Transparency (DATA)
Act of 2014. DOT collaborated across the Department to coordinate the cross-functional efforts
of its financial, procurement and financial assistance staff to ensure that DOT financial and
award information was reported to the government-wide website, www.usaspending.gov.

DOT was fully compliant with the DATA Act reporting requirements and exerted effective
controls over its DATA Act reporting process. We were one of the first cabinet level agencies to
submit data files prior to the reporting deadline. As the OIG cited in its draft report, we reported
transactions in a timely manner over 96 percent of the time and our submission was over 80
percent complete.

Based upon our review of the draft OIG report, we concur with the three recommendations, as
written and plan to complete all three no later than March 1, 2018. We appreciate the
opportunity to respond to the OIG draft report. Please contact Laura Herz in the Office of
Financial Management, at (202) 366-9948 with any questions.

U.S. DOT OIG
Fraud & Safety
☏Hotline

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https://www.oig.dot.gov/hotline

Our Mission

OIG conducts audits and investigations on behalf of the American public to improve the performance and integrity of DOT's programs to ensure a safe, efficient, and effective national transportation system.