



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

The Office of Inspector General contracted with Williams, Adley & Company, LLP, to review the U.S. Environmental Protection Agency's (EPA's) plans for migrating data from the Integrated Contracts Management System (ICMS) to the EPA Acquisition System (EAS) to determine whether planned controls will ensure complete and accurate data transfer.

Background

EPA's Office of Acquisition Management supports the procurement needs of program offices throughout the EPA and utilizes the ICMS system to facilitate that process. The Office of Acquisition Management is in the process of replacing the in-house-developed ICMS system with EAS, a commercial off-the-shelf acquisition system that will be configured and modified to meet EPA requirements. As part of the implementation process, data residing in ICMS will be migrated to EAS.

For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.

To view the full report, click on the following link:
www.epa.gov/oig/reports/2010/20100224-10-P-0071.pdf

Plans to Migrate Data to the New EPA Acquisition System Need Improvement

What Williams, Adley & Company, LLP, Found

EPA's plans for migrating data from ICMS to EAS lack sufficient incorporation of data integrity and quality checks to ensure the complete and accurate transfer of procurement data. In particular, verification of overall data accuracy relies heavily on Contracting Officers to review their own contract data in EAS after it has been migrated from ICMS. However, EPA does not require that Contracting Officers attend data migration training. In addition, plans to migrate closed contracts do not require verification of the accuracy and completeness of that data, which will be utilized for historic reporting purposes in EAS. While EAS data validation and edit checks will enforce integrity constraints over user-entered data, proper data migration controls are paramount to ensuring that the acquisition data transfer accurately and completely from ICMS to EAS.

Proper data migration controls ensure data intended for migration arrive in the new system ready for their intended purpose and that erroneous data are identified and corrected prior to release in the new system. By taking steps to improve its data migration strategy now, EPA increases its chances of achieving effective data clean-up prior to migrating ICMS data to EAS. Likewise, incorporation of data integrity checks and manual quality control review of data would provide management with assurance that (1) it could rely on the accuracy and completeness of the data in the new system, and (2) it could report EPA has effective internal controls over financial reporting as required by Office of Management and Budget Circular A-123, *Management's Responsibility for Internal Control*.

What Williams, Adley & Company, LLP, Recommends

Williams, Adley & Company, LLP, recommends that the Director, Office of Acquisition Management, Office of Administration and Resources Management, require third-party review of migrated data for active and inactive contracts prior to release in EAS, enhance the EAS data migration training requirements and ensure all Contracting Officers involved in the process attend the training, and develop a plan to ensure closed contract data are reviewed for accuracy.

The Agency generally agreed with the findings and recommendations.