



U.S. ENVIRONMENTAL PROTECTION AGENCY

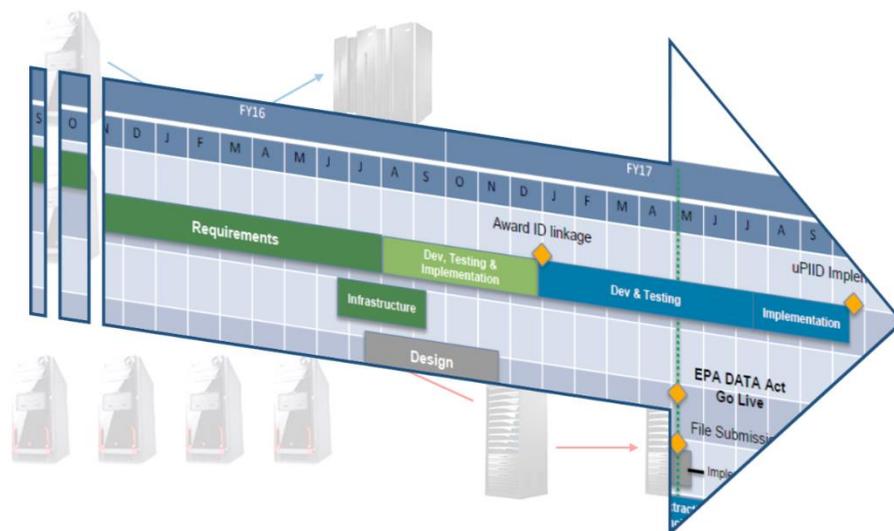
OFFICE OF INSPECTOR GENERAL

Financial Management

Status of EPA's Implementation of the DATA Act

Report No. 17-P-0050

December 2, 2016



Report Contributors:

Paul Curtis
Meg Hiatt
Kevin Ross
Jennifer Hutkoff

Abbreviations

CIGIE	Council of the Inspectors General on Integrity and Efficiency
DATA Act	Digital Accountability and Transparency Act of 2014
EPA	U.S. Environmental Protection Agency
GAO	U.S. Government Accountability Office
OCFO	Office of the Chief Financial Officer
OIG	Office of Inspector General
OMB	U.S. Office of Management and Budget

Cover image: EPA OIG graphic depicting EPA implementation of the DATA Act.

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At a Glance

Why We Did This Review

We performed this audit to gain an understanding of the processes, systems and controls that the U.S. Environmental Protection Agency (EPA) has implemented, or plans to implement, to report financial and payment data in accordance with the requirements of the Digital Accountability and Transparency Act of 2014 (DATA Act); and to provide recommendations on how to improve the likelihood of compliance with the requirements of the DATA Act prior to full implementation.

The Council of the Inspectors General on Integrity and Efficiency encouraged the Inspector General community to undertake DATA Act readiness reviews at their respective agencies.

The Office of Technology Solutions in the EPA's Office of the Chief Financial Officer oversees EPA implementation of the DATA Act.

This report addresses the following EPA goal or cross-agency strategy:

- *Embracing EPA as a high-performing organization.*

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Listing of [OIG reports](#).

Status of EPA's Implementation of the DATA Act

What We Found

We found that the EPA has taken steps to implement the DATA Act. The EPA plans to go live in May 2017 using partial data and a phased-in approach to comply with the key legislative milestone.

The EPA plans to implement the DATA Act with partial data in May 2017 to comply with the act.

The EPA is following the U.S. Office of Management and Budget's and U.S. Department of the Treasury's eight-step DATA Act implementation strategy. Regarding the progress on these steps, the EPA:

- Established a DATA Act work group with the right mix of personnel needed to oversee implementation of the act.
- Performed a review of the data elements, and determined where the data will be extracted in the EPA's systems.
- Documented an initial inventory of EPA data elements and systems against data elements.

The EPA is currently in Step 4, Design & Strategize, and Step 5, Prepare Data for Submission to the Broker, and plans to complete Steps 6 through 8—Test Broker Implementation, Update Systems, and Submit [partial] Data—in May 2017.

The EPA identified key risks to the DATA Act implementation, such as linking award identification among the EPA's financial and procurement systems; submitting complete data files to Treasury; timing differences, data inconsistencies and reconciling data between the EPA internal and external systems; and funding to support the consolidation and preparation of agency data for reporting under the DATA Act. The EPA has identified mitigations to address these risks.

Agency Response and Office of Inspector General Evaluation

The agency submitted an updated DATA Act Implementation Plan to the U.S. Office of Management and Budget and U.S. Department of the Treasury on August 11, 2016, that outlines the EPA's approach to implement the DATA Act reporting requirements in May 2017. Since that implementation plan is designed for the EPA to meet the statutory deadline with a partial data submission, we have no recommendations.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

December 2, 2016

MEMORANDUM

SUBJECT: Status of EPA's Implementation of the DATA Act
Report No. 17-P-0050

FROM: Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

TO: David Bloom, Deputy Chief Financial Officer

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). The project number for this audit was OA-FY16-0077. This report represents the opinion of the OIG and does not necessarily represent the final EPA position.

The Office of Technology Solutions, within the Office of the Chief Financial Officer, oversees EPA implementation of the DATA Act.

Action Required

Because this report contains no recommendations, you are not required to respond to this report. However, if you submit a response, it will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

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Purpose

The objectives of our audit were to gain an understanding of the processes, systems and controls that the U.S. Environmental Protection Agency (EPA) has implemented, or plans to implement, to report financial and payment data in accordance with the requirements of the Digital Accountability and Transparency Act of 2014 (DATA Act); and to provide recommendations on how to improve the likelihood of compliance with the requirements of the DATA Act prior to full implementation.

Background

The DATA Act was enacted on May 9, 2014, and requires that federal agencies report financial and payment data in May 2017, in accordance with data standards established by the U.S. Office of Management and Budget (OMB) and U.S. Department of the Treasury. The data reported will be displayed on a website available to taxpayers and policy makers.

OMB issued guidance¹ that directed agencies to:

- Implement data definition standards for the collection and reporting of agency-level and award-level data.
- Implement a standard data exchange format for providing data to Treasury, to be displayed on USAspending.gov or a successor site.
- Link agency financial systems with award systems by continuing the use of specified unique identification numbers for financial assistance awards and contracts.
- Provide reasonable assurance that their internal controls support the reliability and validity of the agency account-level and award-level data they submit to Treasury for publication on USAspending.gov on a quarterly basis.

OMB and Treasury also issued a DATA Act Implementation Playbook, Version 2.0, in June 2016, which recommended eight key steps for agencies to fulfill their requirements under the DATA Act, as noted in Table 1.

¹ OMB M-15-12, *Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable*; and OMB Management Procedures Memorandum No. 2016-03, *Additional Guidance for DATA Act Implementation: Implementing a Data-Centric Approach for Reporting Federal Spending Information*.

Table 1: OMB's and Treasury's eight-step implementation plan for agencies

Step	Steps for agencies
1	Organize Team <i>Create an agency DATA Act work group including impacted communities (e.g., Chief Information Officer, Budget, Accounting, etc.) and identify Senior Accountable Official.</i>
2	Review Elements <i>Review list of DATA Act elements and participate in data definitions standardization.</i>
3	Inventory Data <i>Perform inventory of agency data and associated business processes.</i>
4	Design & Strategize <i>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.</i>
5	Prepare Data for Submission to the Broker <i>Implement system changes and extract data (includes mapping of data from agency schema to the DATA Act Schema) iteratively.</i>
6	Test Broker Implementation <i>Test broker outputs to ensure data are valid iteratively.</i>
7	Update Systems <i>Implement other changes iteratively (e.g., establish linkages between program and financial data, capture any new data).</i>
8	Submit Data <i>Update and refine process (repeat 5-7 as needed).</i>

Source: OMB's and Treasury's DATA Act Implementation Playbook (June 2016).

The DATA Act provides for oversight by Inspectors General and the U.S. Government Accountability Office (GAO), and requires a series of oversight reports to include an assessment of the completeness, timeliness, quality and accuracy of data submitted. The first set of Inspector General reports are due to Congress in November 2016. However, agencies are not required to submit spending data in compliance with the DATA Act until May 2017.

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) identified a timing anomaly with the oversight requirements in the DATA Act. The Inspectors General plan to provide Congress with their first required reports in November 2017, a 1-year delay from the statutory due date, with subsequent reports following on a 2-year cycle. Although CIGIE determined the best course of action was to delay the Inspector General reports, CIGIE is encouraging Inspectors General to undertake DATA Act "Readiness Reviews" at their respective agencies well in advance of the first November 2017 report. On December 22, 2015, CIGIE's chair issued a letter memorializing the strategy for dealing with the Inspector General reporting date anomaly, and communicated it to the Senate Committee on Homeland Security and Government Affairs and the House Committee on Oversight and Government Reform. Appendix A provides a copy of this letter.

Responsible Offices

The Office of Technology Solutions, within the EPA's Office of the Chief Financial Officer (OCFO), maintains responsibility over EPA implementation of the DATA Act. Other offices involved in implementing the DATA Act include OCFO's Office of Controller and Office of Budget, the Office of Administration and Resources Management, and the Office of Environmental Information.

Scope and Methodology

We conducted this audit from February through August 2016. We conducted the performance audit in accordance with generally accepted government auditing standards. 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.

To gain an understanding of the EPA's processes for implementing the DATA Act, we:

- Reviewed laws, legislation, directives, and other regulatory criteria and guidance related to the EPA's responsibilities to report financial and payment information under the DATA Act.
- Conducted interviews with the EPA's DATA Act work group responsible for implementation of the DATA Act at the agency level.
- Assessed the EPA's efforts and formal implementation plan to report financial and payment information under the DATA Act.

We did not review the internal controls over the EPA's systems used to generate data; our review was limited to the EPA's progress in implementing the DATA Act.

Prior Audit Coverage

We researched prior reports related to implementing the DATA Act. The following GAO reports disclosed findings pertinent to our review:

- *Data Standards Established, but More Complete and Timely Guidance Is Needed to Ensure Effective Implementation*, [GAO-16-261](#), issued **January 29, 2016**. The report found that while the OMB and Treasury issued definitions for 57 federal spending data elements as required, several data element definitions are subject to interpretation that could lead to inconsistent reporting. Without more interpretive clarification, agencies run the risk of reporting data that cannot be aggregated

governmentwide. GAO’s review of selected implementation plans found that agencies need the technical guidance and intermediary service to be finalized before they can develop detailed agency-level plans. If this guidance is not aligned with agency implementation timelines, agencies may delay taking key steps, or may need to revise existing plans once final technical guidance is released, thereby hindering their ability to meet DATA Act requirements and timelines. GAO recommended that OMB and Treasury provide agencies with clarifications to address potential quality issues with the definitions, and take steps to align the release of finalized technical guidance with agency implementation time frames.

- ***Progress Made but Significant Challenges Must Be Addressed to Ensure Full and Effective Implementation, [GAO-16-556T](#), issued April 19, 2016.*** The GAO’s ongoing review of required implementation plans submitted to OMB indicates that federal agencies have identified significant challenges in implementing the DATA Act, including competing priorities, resources, systems integration and guidance. Some agencies identified strategies to mitigate identified challenges, including effective communication and information sharing, and leveraging of existing resources; they reported that additional support from OMB and Treasury is needed for successful implementation. The GAO identified seven overarching categories of challenges reported by agencies to effectively and efficiently implement the DATA Act.

Table 2: Challenges identified by federal agencies

Category	Description of reported challenges
Competing Priorities	Statutory, regulatory, policy or other agency-specific matters that have competing priorities or conflicting requirements.
Resources	Lack of funding or human resources reported by agencies as needed for implementation.
Systems Integration	Technology issues, including challenges with integrating multiple existing and disparate financial and management systems, or the need to install new systems or modify existing systems to implement the DATA Act.
Guidance	Incomplete, unclear and evolving guidance on requirements, including data elements, technical schema, and other key policies issued by OMB and Treasury.
Dependencies	Agency implementation activities that are dependent on other parties or actions being taken before the agency can proceed (i.e., additional guidance issued, resource limitations, financial systems being integrated, or resolution of competing priorities).
Timeframes	Short length of time for agencies to implement DATA Act requirements.
Other	Other reported challenges by agencies relating to project or program management, reporting frameworks and data issues.

Source: GAO analysis of agency implementation plans (GAO-16-556T).

Results of Review

We found that the EPA has taken steps to implement the DATA Act and plans to implement the act with a partial data submission. The EPA has identified risks to completely implementing the act as mandated by the statutory deadline.

The EPA is following the OMB's and Treasury's eight-step DATA Act implementation strategy, and has completed the first three steps. Specifically the EPA:

1. Established a DATA Act work group; the group has the right mix of contracts, grants and information technology personnel needed to oversee the implementation of the DATA Act.
2. Performed a review of the data elements, and determined where the data will be extracted in the EPA's systems.
3. Documented an initial inventory of data elements and systems.

The EPA is currently in Step 4, Design & Strategize, and Step 5, Prepare Data for Submission to the Broker, referenced in the DATA Act Implementation Playbook Version 2.0. The EPA plans to complete Steps 6 through 8—Test Broker Implementation, Update Systems and Submit [partial] Data—in May 2017, to comply with the key legislative milestone.

The EPA identified the following key risks to the DATA Act:

- ***Award Identification Linkage:*** Compass Financials (the EPA's financial system), Integrated Grants Management System, EPA Acquisition System, and other linked systems or databases must be modified to share a standard Award Identification to allow full financial and procurement reporting.
- ***Delivery of Reporting Submission Specification Files A, B and C² in May 2017:*** Since the EPA's general ledger beginning balances currently do not contain requested fields in File B, there may be gaps in data at the object class and program activity level. The agency will not be able to submit a complete File B, which may have to be delivered in partial scope to Treasury in May 2017. The agency will need to identify, track and be able to explain these differences.
- ***Timing Differences Associated With Data Reconciliation:*** The EPA recognizes the risk to accurate data reconciliation due to differences in the timing of data extraction from external systems. For example, Federal

² Required Submission Specification Files A, B and C represent the following: File A = Appropriation Accounts, File B = Object Class Program Activity, and File C = Award and Financial Data.

Procurement Data System data is extracted on the first day of the month, but the EPA data collected for Required Submission Specification File C is from the second day of the month.

- **Data Inconsistencies:** The EPA recognizes the risk associated with data source issues and reconciling data between the EPA internal systems and external systems to the EPA. The agency will need to be able to clearly explain the data discrepancies between its overall financial balances and the figure being shown in the beginning balances.
- **Funding:** The EPA requires funding resources to support the consolidation and preparation of agency data for reporting under the standards of the DATA Act. Agency efforts to comply with the requirements of the DATA Act have not received funding support through the appropriations process.

Subsequent to our fieldwork, the agency met with OMB and Treasury to review the agency issues and meeting the May 2017 reporting requirement. OMB and Treasury recommended that the EPA consider a phased-in approach to reporting, and communicated that the submission of a partial file still fulfills the May 2017 DATA Act requirement. As an outcome of the OMB and Treasury meeting, the EPA updated the schedule and milestones, and submitted an updated Implementation Plan to OMB on August 11, 2016. The EPA also established data governance to address any discrepancies or issues that may arise when data is being reconciled, improved or validated. Additionally, the EPA has drafted a Data Management Plan that outlines a set of roles, processes and tools to effectively manage EPA systems to govern financial, mixed-financial and non-financial data.

The major change to the updated implementation plan is that the EPA now plans to implement the DATA Act with partial data in May 2017, to comply with the key legislative milestone. The EPA has revised its major milestones to reflect what the agency expects to complete as part of the updated DATA Act Implementation Plan.

Table 3: EPA major milestones

	Milestones	Start	Finish
1	Requirements	Oct. 2015	Aug. 2016
2	Design	Jul. 2016	Nov. 2016
3	Phase I Award ID Linkage	Aug. 2016	Jan. 2017
4	Governmentwide Treasury Account Symbol Adjusted Trial Balance System Implementation	Oct. 2016	Dec. 2016
5	Development	Nov. 2016	Apr. 2017
6	Phase II Testing and Training	Mar. 2017	Apr. 2017
7	Phase II File Submission (Go Live)	May 2017	
8	Phase III Testing	Jun. 2017	Aug. 2017
9	Phase III Implementation (File Submission, Unique Procurement Instrument Identifier)	Aug. 2017	Oct. 2017

Source: EPA's DATA Act Implementation Plan (August 11, 2016).

The EPA's updated Implementation Plan includes a three-phased approach:

- **Phase I** – Implement the Award Identification linkage requirement by January 2017.
- **Phase II** – Go live with submission of partial data files in May 2017.
- **Phase III** – Implement the unique Procurement Instrument Identifier and fully submit data files by October 2017.

In Phase I, as part of the solution to address gaps in agency data, the EPA plans to link the data contained in its financial and management systems via a common Award Identification.

In Phase II, the EPA plans to consolidate the requested financial data from Compass Financials, grants data from the Integrated Grants Management System, and procurement data from the EPA Acquisition System into the DATA Act Evaluation and Approval Repository prior to submission to the Treasury's Data Broker.

In Phase III, the EPA plans to perform additional testing and data reconciliation, implement a unique Procurement Instrument Identifier, and submit complete data files by October 2017.

Since the EPA's DATA Act implementation plan is designed to meet the statutory deadline with a partial data submission, we do not have any recommendations that would increase the likelihood of compliance with the May 2017 financial and payment data reporting requirements of the DATA Act.

Agency Response and OIG Evaluation

The OCFO response to the draft report is based on its revised August 11, 2016, implementation plan. The OIG draft report outlined the EPA's status of implementing the DATA Act as of July 2016 when we completed the collection of information for our audit fieldwork.

In its response, the agency stated that, in line with the OMB and Treasury guidance, the EPA submitted an updated DATA Act Implementation Plan to OMB and Treasury on August 11, 2016. The EPA's updated DATA Act Implementation Plan outlines the EPA's approach to implement the DATA Act reporting requirements with partial data submission in May 2017. The EPA believes the OIG draft report did not fully leverage the agency's position. As stated above, the OIG draft report was based on work performed and collection of information prior to completion of the EPA's revised implementation plan.

The agency subsequently provided information about meeting with OMB and the Treasury. Based on the agency's updated implementation plan and this additional information, we revised our report.

CIGIE DATA Act Letter



Council of the
INSPECTORS GENERAL
on INTEGRITY and EFFICIENCY

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 intent of the

1717 H Street, NW, Suite 825, Washington, DC 20006

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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

Agency Response to Draft Report

September 13, 2016

MEMORANDUM

SUBJECT: Draft Report: Status of EPA’s Implementation of the DATA Act as of July 2016
Project No. OA-FY16-0077 dated August 23, 2016

FROM: David A. Bloom, Deputy Chief Financial Officer

TO: Paul C. Curtis, Director, Financial Audits

Thank you for the opportunity to respond to the draft report on Status of EPA’s Implementation of the DATA Act as of July 2016, Project No. OA-FY16-0077. The following is a summary of the agency’s overall position, along with its response to each of the report recommendations.

AGENCY’S OVERALL POSITION

The agency does not concur with the draft report and found several inaccuracies in the report findings.

AGENCY’S RESPONSE TO DRAFT REPORT STATUS

In line with the OMB and Treasury guidance, the EPA submitted an updated DATA Act Implementation Plan to OMB and Treasury on August 11, 2016. The updated DATA Act Implementation Plan outlines EPA’s approach to implement the DATA Act reporting requirements in May 2017. The OCFO response to the draft report is based on the current implementation plan. The draft report that was issued on August 23, 2016, did not take into account the agency’s updated implementation plan. Therefore, we believe it does not fully leverage the agency’s position and provide an opportunity for the OIG review which we believe it’s critical to evaluate the current implementation plan and issue the applicable findings.

Disagreements

No.	Page / Section /Sub-Section	OIG Finding	OCFO Response
1	At a Glance / What We Found / Paragraph 3 and “call-out box”	“The EPA did not intend to implement the DATA Act by the May 2017 statutory deadline because it will not implement its new Account Code Structure until after the deadline.”	Please reference the updated DATA Act Implementation Plan (p.1, Introduction) from 8/11/2016. EPA will meet the May 2017 statutory deadline and all references to the ACS project were removed.

No.	Page / Section /Sub-Section	OIG Finding	OCFO Response
2	At a Glance / What We Found / Paragraph 4	“The EPA DATA Act implementation plan was not designed for the EPA to meet the statutory deadline.”	The project planning effort included changes in assumptions and an evolving understanding of the requirements. There was no explicit intention of missing the May 2017 deadline.
3	p.3 / Responsible Offices	“The EPA’s Office of the Controller within the OCFO maintains responsibility over implementing the DATA Act.”	In April 2016, OCFO shifted DATA Act Implementation responsibility from the Office of the Controller (OC) to the Office of Technology Solutions (OTS).
4	p.4 / Results of Review / Paragraph 1	“As of July 29, 2016, we found that the EPA did not intend to meet the May 2017 statutory deadline to submit spending data because the EPA has not completed a new ACS.”	Although the OIG draft report is dated 8/23/2016, and “anything that comes to the OIG’s attention up to the report date should be included in the report”, OIG is not crediting the EPA with its changed strategy that ACS no longer impacts DATA Act implementation and that the EPA will implement DATA Act in May 2017. Please reference the updated DATA Act Implementation Plan from 8/11/2016 (p.1, Introduction).
5	p.5 / Results of Review / Paragraph 1, #2	“Performed a review of the data elements, and determined where the data will be extracted in the EPA’s systems in May 2015.”	The date accomplished is April 2016 per updated EPA Agency Progress Dashboard reported to OMB/Treasury. Please reference the 7/21/2016 email and attached Dashboard file.
6	p.5 / Results of Review / Paragraph 1, #4	“Completed the planning and strategizing for a data broker design and construction using existing EPA systems for pulling data in July 2015.”	The anticipated date to accomplish this task is January 2017 per updated EPA Agency Progress Dashboard reported to OMB/Treasury. Please reference the 7/21/2016 email and attached Dashboard file.
7	p.5 / Results of Review / Paragraph 2	“In addition, we determined that the EPA adequately addressed the following topics in the EPA’s Implementation Plan:	While the report addresses establishing a DATA Act work group the establishment of a Data Governance Board is not addressed in the report.

No.	Page / Section /Sub-Section	OIG Finding	OCFO Response
8	pp.5-6 / Results of Review / Paragraph 5	<p>“Due to the new ACS...”</p> <p>“Timely implementation of the DATA Act at EPA is reliant on implementing the new ACS...”</p>	<p>The EPA is not delaying DATA Act Implementation due to ACS. Please reference the 7/18/2016 email from Eva Ripollone to OIG on the issue. Please also reference the updated DATA Act Implementation Plan from 8/11/2016 (p.1, Introduction).</p>
9	p.6 / Results of Review / Paragraph 3	<p>“As of July 29, 2016, the EPA’s DATA Act Implementation Plan was not designed to meet the statutory deadline.”</p>	<p>As of the date of this draft audit report (8/23/2016), the EPA submitted an updated Data Act Implementation Plan that states it will meet the May 2017 statutory deadline for implementation.</p>
10	p.6 / Subsequent Events	<p>“Subsequent to our audit work...”</p>	<p>On 7/18/2016, OTS informed OIG that ACS was “removed from the Data Act Implementation Plan”. Please reference the 7/18/2016 email from Eva Ripollone to OIG on the issue.</p> <p>There is no mention of EPA providing OMB/Treasury with the updated DATA Act Implementation Plan on 8/11/2016 even though the date of this audit report is 8/23/2016.</p>
11	p.6 / Subsequent Events	<p>“We have not received sufficient information and documentation to support OMB’s and Treasury position that the submission of a partial file fulfills the DATA Act requirement as intended by Congress.”</p>	<p>Meeting notes and follow-up confirmation with Treasury was provided. Additionally, on the 9/9/2016 DATA Act Monthly SAO Meeting Treasury indicated they are not providing any additional details to the reporting guidance that supports the guidance provided during individual agency discussions and Treasury offered their assistance if additional information was needed for OIG Readiness Reviews / Audits.</p>

CONTACT INFORMATION

If you have any questions regarding this response, please contact Eva Ripollone, 202-564-6768.

4 Attachments

1. Updated DATA Act Implementation Plan, dated August 11, 2016
2. Agency Progress Dashboard
3. Email Correspondence, between Treasury and EPA
4. DATA Act Meeting Notes from June 30, 2016

cc: Howard Osborne
Randy Thornton
Donna Vizian
John Showman
Stefan Silzer
Jeanne Conklin
Carol Terris
Quentin Jones
Rob Hill
Denise Polk
Howard Corcoran
Christopher Osborne
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