



**REVIEW OF NCUA'S DIGITAL ACCOUNTABILITY  
AND TRANSPARENCY ACT OF 2014 READINESS**

**Report #OIG-16-09**

**November 16, 2016**



A handwritten signature in black ink, appearing to read "James W. Hagen".

*James W. Hagen*  
*Inspector General*



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## EXECUTIVE SUMMARY

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The National Credit Union Administration (NCUA) Office of Inspector General (OIG) conducted this review in accordance with the Digital Accountability and Transparency Act of 2014<sup>1</sup> (DATA Act). Specifically, we conducted this review to gain an understanding of the processes, systems, and controls that NCUA has implemented or plans to implement to report financial and payment data in accordance with the requirements of the DATA Act. To accomplish our objectives, we interviewed NCUA management and staff. We also obtained and reviewed the laws, directives, and other regulatory criteria and guidance related to NCUA's responsibilities to report financial and payment information under the DATA Act. Additionally, we assessed NCUA's efforts and formal implementation plans to report financial and payment information under the DATA Act.

The DATA Act requires federal agencies to disclose agency expenditures of appropriated funds, such as contract, loan, and grant spending information, over \$3,500. We determined that NCUA receives an annual appropriation from Congress only for the Community Development Revolving Loan Fund (CDRLF). In addition, NCUA's Office of General Counsel (OGC) determined that because NCUA's operating funds derive from assessments on its insured entities and not from appropriations, the DATA Act reporting requirements only apply to the CDRLF.

The DATA Act also requires the Office of Management and Budget (OMB) and the Department of the Treasury (Treasury) establish Government-wide financial data standards. To comply with the DATA Act, agencies must report, by May 2017, spending information in accordance with data standards established by OMB and Treasury. We determined that NCUA has taken the necessary steps to meet the DATA Act's reporting deadline. Specifically, we determined that NCUA's DATA Act implementation plan was consistent with OMB requirements.

We also determined that NCUA's implementation plan and actions were consistent with Treasury's DATA Act guidance. We found that NCUA's DATA Act implementation team consists of individuals with a variety of agency program knowledge. However, we determined that when NCUA analyzed the data reporting elements identified by OMB and Treasury, it encountered a challenge with capturing and reporting the required data. NCUA considered several possible solutions, such as hiring a contractor to perform the services manually or acquiring PRISM,<sup>2</sup> which had an estimated one-time cost of \$684,000 and annual costs of \$269,000. Ultimately, NCUA determined that acquiring PRISM would not be cost effective because the CDRLF typically only awards approximately 300 grants yearly, totaling approximately \$2.2 million. NCUA concluded that an automated process to capture as many of the data elements as possible as well as having its Office of Small Credit Union Initiatives (OSCU) manually process the data, would allow NCUA to report accurate and complete

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<sup>1</sup> Pub. L. No. 113-101.

<sup>2</sup> PRISM (Procurement Request Information System) is a federal and defense acquisition and grants management system.



information. We further determined that NCUA tested three required data files<sup>3</sup> with the Treasury data broker, and all three files passed.

In addition, the Government Accountability Office (GAO) initiated a review of DATA Act implementation plans and identified 51 specific plan elements or items that each plan should contain. Although GAO determined that none of the agencies' plans addressed all 51 plan elements, we determined NCUA's implementation plan was consistent with OMB guidance.

Finally, management informed the OIG that NCUA is acquiring PRISM's Acquisition Management module to track NCUA's overall spending. Management indicated that NCUA might eventually be capable of reporting on non-appropriated funds, consistent with the DATA Act reporting requirements. Although we make no recommendations in this report, in keeping with the spirit of the DATA Act and to enhance agency transparency, we strongly encourage management to report on NCUA's non-appropriated funds.

We appreciate the cooperation and courtesies NCUA management and staff provided to us during this review.

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<sup>3</sup> The required data files were Appropriations Account Detail, Object Class and Program Activity Detail, and Award Financial Detail.



## BACKGROUND

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### Digital Accountability and Transparency Act

The Digital Accountability and Transparency Act of 2014 (DATA Act), enacted on May 9, 2014, expands on the Federal Funding Accountability and Transparency Act of 2006<sup>4</sup> (FFATA) by requiring agencies to disclose direct agency expenditures. As a result, agency programs will be linked to contract, loan, and grant spending information, thereby enabling taxpayers and policy makers to more effectively track Federal spending. The DATA Act also requires that OMB and Treasury establish Government-wide data standards for financial data as well as ensure they accurately post and display such financial data on USASpending.gov.<sup>5</sup>

On May 8, 2015, OMB issued Memorandum M-15-12, “Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable.” This memorandum provided guidance to Federal agencies on current FFATA reporting requirements as well as new requirements under the DATA Act. OMB M-15-12 required agencies to develop an implementation plan that would estimate resource requirements, propose an implementation timeline, and identify any foreseeable challenges, such as competing statutory, regulatory, or policy priorities. In addition, the memorandum indicated that agencies should provide suggestions to mitigate identified challenges as well as offer recommendations for how their implementation plan would manage costs and support agency investment planning. Finally, the memorandum indicated that agency implementation plans should also include cost estimates and address the use of existing information technology and collaboration with the Chief Information Officer.

To help agencies fulfill the DATA Act requirements, concurrent with OMB’s issuance of Memorandum M-15-12, Treasury issued an 8-Step<sup>6</sup> implementation plan entitled the “DATA Act Implementation Playbook.” The Playbook contained suggested steps and timelines to help agencies develop a methodology to implement DATA Act requirements.

In addition, to standardize spending information, OMB and Treasury identified 57 data elements that agencies must report. The data elements, for example, address awardee and recipient information, award amount, award characteristics, funding and awarding entities, and account funding information. Agencies must report spending data in compliance with the DATA Act by May 2017.

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<sup>4</sup> Pub. L. No. 109–282, enacted on September 26, 2006.

<sup>5</sup> Mandated under the FFATA, [USASpending.gov](http://USASpending.gov) is a searchable website where the public can access information on entities and organizations receiving federal funds.

<sup>6</sup> See page 8 for Treasury’s 8-Step Playbook.



## Inspector General Reports

The DATA Act also requires agency Inspectors General (IGs) to submit a series of oversight reports beginning in November 2016.<sup>7</sup> Specifically, the DATA Act requires IGs to review statistical samples of the data submitted by their respective agency and report on the completeness, timeliness, quality, and accuracy of the data sampled, as well as the data standards used by the agency. However, under the DATA Act, the first IG oversight report is due six months *prior* to the May 2017 agency compliance date.

To address this reporting date anomaly, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) informed Congress of the situation and developed an agreeable approach. In a letter to Congress dated December 22, 2015,<sup>8</sup> the CIGIE chair stated that to help ensure the success of the DATA Act implementation, IGs would conduct DATA Act Readiness Reviews at their respective agencies for submission to Congress in November 2016. Subsequently, the IGs would provide Congress with their first required oversight reports in November 2017, a one-year delay from the due date in the statute, with the additional reports following on a two-year cycle, in November 2019 and November 2021.

## NCUA Community Development Revolving Loan Fund

NCUA is an independent federal agency that regulates, charters, and supervises federal credit unions. NCUA, which receives no appropriations for its operations, is funded by credit union fees. On November 20, 1979, Congress established the Community Development Revolving Loan Fund<sup>9</sup> (CDRLF) for credit unions to stimulate economic development in low-income communities. Specifically, the CDRLF's purpose is to promote economic activities, which are expected to lead to increased income, ownership, and employment opportunities for low-income residents as well as other economic growth. Federally-chartered and state-chartered credit unions with a low-income designation are eligible to participate in CDRLF's loan and technical assistance grant program.

NCUA receives a limited annual appropriation<sup>10</sup> from Congress to administer the CDRLF,<sup>11</sup> which is managed by NCUA's Office of Small Credit Union Initiatives (OSCU). Since establishing the CDRLF, Congress has appropriated approximately \$13.4 million for revolving loans. During 2015, NCUA disbursed \$1.5 million in loans. As of the end of 2015, the CDRLF had a total of \$9.4 million in outstanding loans. Since 2001, Congress has appropriated more than \$16.8 million in technical assistance grants. During both 2015 and 2016,<sup>12</sup> NCUA awarded approximately \$2.5 million in technical assistance grants to low-income designated credit unions.

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<sup>7</sup> The DATA Act requires IGs to submit oversight reports to Congress in November 2016, 2018, and 2020.

<sup>8</sup> For CIGIE letter to Congress see Appendix C.

<sup>9</sup> Pub. L. No. 96-123.

<sup>10</sup> Assistance to credit unions is limited to the amount appropriated by Congress, to date.

<sup>11</sup> The only appropriation NCUA receives from Congress is for the CDRLF.

<sup>12</sup> As of July 26, 2016.



In regards to reporting spending data, NCUA's Office of the Chief Financial Officer (OCFO) requested that OGC provide an opinion on NCUA's reporting requirements for the DATA Act. In January 2016, OGC informed OCFO that consistent with its May 2013 determination regarding FFATA, as amended by the DATA Act, FFATA financial reporting requirements continue to apply only to *appropriated* funds for the CDRLF. OGC determined that because NCUA's operating funds, including the National Credit Union Share Insurance Fund, derive from assessments on its insured entities and not from appropriations, the DATA Act reporting requirements only apply to the CDRLF.



**RESULTS IN DETAIL**

We determined that NCUA has taken the necessary steps to meet the DATA Act’s May 2017 reporting deadline. Specifically, we determined that NCUA’s DATA Act implementation plan was consistent with OMB requirements. We also determined that NCUA’s implementation plan and actions were in line with Treasury’s DATA Act Implementation Playbook.

**NCUA DATA Act Implementation Plan<sup>13</sup>**

We determined that NCUA initially planned to follow the Department of Transportation’s Enterprise Services Center (ESC)<sup>14</sup> DATA Act implementation plan because NCUA uses Delphi, the ESC-provided financial management system NCUA uses to manage CDRLF’s accounting transactions. However, part of ESC’s plan included using PRISM to capture some of the data elements and the CDRLF does not use PRISM. Consequently, NCUA staff created the CDRLF DATA Act Implementation Plan, which detailed how NCUA would comply with the DATA Act by May 9, 2017.

To comply with the DATA Act, NCUA plans to implement its DATA Act Implementation Plan in three major phases with each phase divided into two parts, A and B. Part A is the research, analysis, design, strategy and solution phase. Part B is the building and Plan execution phase. Table 1 (below) provides the phase status as of September 2016:

Table 1.

Phase Status for NCUA’s DATA Act Implementation Plan		
Phase	Description	Status
1	OMB January 2016 Object Class <sup>15</sup> reporting deadline	Completed
2	OMB April 2016 Program Activity reporting deadline	Completed
3	DATA Act May 2017 reporting deadline	Active

Consistent with the OMB requirements, NCUA’s implementation plan included:

- Required resource estimates;
- A timeline with major milestones and written details – broken down by phases;
- Foreseeable challenges such as timing, linking,<sup>16</sup> and reconciliation issues;

<sup>13</sup> NCUA updated the implementation plan to reflect phase completion and guidance changes.

<sup>14</sup> ESC is a federal shared service provider.

<sup>15</sup> Object classes are categories in a classification system that presents obligations by the items or services purchased by the Federal Government.

<sup>16</sup> Linking refers to agencies that use the award identification number to link financial and non-financial data.



- Risk mitigation strategies that included action plans; and
- Cost estimates, which included three options that could help manage costs.

The plan also addressed collaboration with NCUA's Office of the Chief Information Officer to leverage using NCUA's existing information technology.

### Government Accountability Office

As part of its ongoing effort to provide interim reports on DATA Act implementation progress and to meet its reporting requirements,<sup>17</sup> GAO requested DATA Act implementation plans from 51 agencies.<sup>18</sup> In January 2016, NCUA submitted its initial CDRLF DATA Act Implementation Plan to GAO.<sup>19</sup> In its July 2016 report, entitled "DATA Act Improvements Needed in Reviewing Agency Implementation Plans and Monitoring Progress," GAO identified 51 specific plan elements or items that should be included in agency implementation plans. GAO determined that *none* of the 42 agency implementation plans reviewed addressed all 51 plan elements. In its report, GAO provided only a summary of their findings and did not list the findings by agency; therefore, we could not determine which of the 51 plan elements NCUA did not include.

Although GAO determined that NCUA's initial CDRLF DATA Act implementation plan did not address all of the 51 plan elements, we determined that NCUA's initial implementation plan and subsequent updates addressed many of the elements. For example, NCUA's implementation plan included a timeline, cost estimates, an implementation narrative, risk mitigation strategies, ongoing activities, and an analysis of the data elements. In addition, although NCUA's plan did not list the Senior Accountable Officer (SAO), NCUA identified and listed the SAO on MAX.gov<sup>20</sup> within the Federal Spending Transparency section<sup>21</sup> of the website. Further, although NCUA's implementation plan did not address all 51 of GAO's plan elements, as previously mentioned, NCUA's implementation plan was consistent with OMB guidance.

In August 2016, GAO requested, and NCUA provided, an updated version of the CDRLF DATA Act Implementation Plan. However, as of the date of this report, GAO had not issued a follow-up report of its review of the updated CDRLF implementation plan.

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<sup>17</sup> Similar to agency IGs, the DATA Act requires GAO to submit a series of reports assessing and comparing the completeness, timeliness, quality, and accuracy of the data submitted under the DATA Act, as well as the implementation and use of data standards by federal agencies.

<sup>18</sup> GAO indicated that it received plans from 42 agencies and that 9 agencies did not submit their plans for various reasons.

<sup>19</sup> NCUA submitted an updated DATA Act implementation plan to GAO in August 2016.

<sup>20</sup> MAX.gov is an OMB sponsored collaboration website that allows work and knowledge sharing among federal government agencies.

<sup>21</sup> The Federal Spending Transparency section of MAX.gov includes updated information on DATA Act implementation, and past work on FFATA implementation.



## **DATA Act Implementation Playbook**

As previously mentioned, Treasury issued the “DATA Act Implementation Playbook,” which contained suggested steps and timelines to help agencies develop a methodology to implement DATA Act requirements. The 8-Step<sup>22</sup> Playbook advised agencies to perform the following:

1. Organize Your Team: Create an agency DATA Act work group including impacted communities within your agency and designate a Senior Accountable Officer;
2. Review Elements: Review the list of DATA Act elements and participate in data definitions standardization;
3. Inventory Data: Perform an inventory of agency data and associated business processes and systems;
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. Execute Broker: Implement system changes and extract data (includes mapping of data from agency schema to the DATA Act schema; and the validation) iteratively;
6. Test Broker Implementation: Test broker outputs to ensure data are accurate and reliable;
7. Update Systems: Implement other system changes (e.g., establish linkages between program and financial data, and capture any new data); and
8. Submit Data: Update and refine process (repeat 5-7 as needed).

### DATA Act General Governance Structure

In accordance with the DATA Act Playbook, we determined that NCUA's DATA Act implementation team consists of individuals with a variety of agency program knowledge. The team includes OSCUI management, a systems analyst, a CyberGrants subject matter expert, a resource manager, and other support personnel. In addition, NCUA's OCFO provided basic oversight to help ensure the processes were in place. For instance, OCFO contacted OGC for a legal opinion on which funds, operating or CDRLF, NCUA would be required to report on under the DATA Act. OCFO also provided technical support and reviewed the implementation plan to help ensure NCUA complies with the DATA Act reporting requirements.

NCUA's Chief Financial Officer is also the agency's SAO. Although the SAO advised the OIG that he did not participate in MAX.gov meetings because CDRLF only represented a small

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<sup>22</sup> We did not include steps 7 and 8 as part of our review because the completion deadlines are during 2017.



fraction of NCUA's overall spending, other agency staff did regularly participate in DATA Act related meetings, such as the project leader participating in weekly conference calls with Treasury and bi-monthly conference calls with ESC.

### DATA Act Implementation Efforts

During NCUA's efforts to comply with the DATA Act, we determined that management encountered a challenge with capturing and reporting the required data. Specifically, NCUA's review of the 57 required DATA Act elements showed that Delphi captured only eleven. NCUA considered several possible solutions including hiring a contractor to perform the services manually and implementing PRISM's Grant Management module with an estimated one-time cost of \$684,000, and \$269,000 annually, thereafter. However, the CDRLF typically awards approximately 300 grants yearly totaling approximately \$2.2 million, resulting in less than 600 transactions annually because NCUA must report the initial award and any remaining obligations.<sup>23</sup> Due to the number of transactions and the cost to purchase and maintain PRISM, NCUA determined that acquiring PRISM's Grant Management module would not be cost effective.

Ultimately, NCUA overcame the challenge of capturing and reporting financial data required under the DATA Act. NCUA management determined that an in-house solution utilizing both a systems analyst to develop an automated process to capture as many of the data elements as possible, as well as an OSCUI staff member manually processing the data, would allow NCUA to report accurate and complete information on all 57 required data elements. NCUA believes, and we concur, that manual processing is feasible because OSCUI staff currently compile and report data manually similar to the DATA Act reporting requirements.

According to NCUA's DATA Act implementation plan, NCUA plans to use the following CDRLF in-house systems to track and monitor grants and to comply with the DATA Act reporting:

- Delphi – an accounting system;
- CyberGrants - a grants and loans application and approval system;
- La Pro - a loan warehousing and maintenance system;
- Datawatch Monarch – data mining software; and
- Internal NCUA databases.

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<sup>23</sup> NCUA must report the initial obligation and if the credit union does not use the entire grant any remaining obligation, which can result in multiple transactions per grant.



We learned during our review that credit unions must have an active account with the federal government's System for Award Management (SAM) in order to apply for grants. NCUA plans to contract with CyberGrants to develop an automated process that verifies whether a credit union has an active registration in SAM when the credit union is applying for a grant. If the credit union does not have an active SAM account, it must create one in order to complete the grant application process.

Under the FFATA, the threshold for reporting federal spending is \$25,000 or greater. However, for appropriated funds, the DATA Act requires agencies to report all financial assistance awards above the micro-purchase level. Federal Acquisition Regulation subpart 2.11 sets the micro-purchase level at \$3,500. During July 2016, NCUA awarded 309 technical assistance grants of which 253 were over \$3,500. Therefore, beginning in May 2017, NCUA must report on approximately 250 grants dispersed through OSCUI that were over \$3,500.

NCUA management officials projected that full compliance with the DATA Act would require a one-time cost of approximately \$500,000 for three full-time employees to manage the annual DATA Act requirements. In addition, NCUA management indicated they would need one additional full-time employee, at an ongoing cost of approximately \$161,000, to administer the technical grants component of the CDRLF. Management estimated that compliance with the DATA Act will cost the agency \$352 per transaction annually, which does not include start-up costs.

### DATA Testing

Federal agencies must submit three reporting files to Treasury's DATA Act Broker:

- File A – Appropriations Account Detail;
- File B – Object Class and Program Activity Detail; and
- File C – Award Financial Detail.

NCUA tested the three files with the Treasury data broker and we verified that all three files passed.

### **Reporting Non-Appropriated Funds**

As previously mentioned, NCUA's OGC determined that the DATA Act reporting requirements apply only to appropriated funds received through the CDRLF, and not NCUA's general operating fund. However, management informed the OIG that NCUA is currently acquiring PRISM's Acquisition Management module to track NCUA's overall spending.<sup>24</sup>

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<sup>24</sup> Management confirmed that PRISM's planned implementation is January 2017.



Management indicated that NCUA may eventually be capable of reporting on non-appropriated funds consistent with the DATA Act reporting requirements. However, management also indicated there are uncertainties the agency needs to overcome before being fully capable of reporting on non-appropriated funds. For example, NCUA has never used PRISM and anticipates that there may be issues to work through once it goes live. In addition, NCUA's analysis showed that neither Delphi, ESC, nor PRISM captured 19 of the 57 data elements. Consequently, NCUA would have to create a data management system or procure a third party application to fill in any gaps in data. Finally, NCUA would have to flesh out the business process to ensure data reliability by addressing such issues as creating unique award identification numbers<sup>25</sup> and testing the reliability of the data. Although these uncertainties pose a challenge, in keeping with the spirit of the DATA Act, we strongly encourage management to work towards being able to one day report on the agency's non-appropriated funds, thereby, enhancing agency transparency.

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<sup>25</sup> NCUA must create a unique award identification number for each financial assistance award, solicitation, contract, agreement, or purchase order and related procurement instrument.



## **Appendix A: Objective, Scope and Methodology**

Our audit objective was to gain an understanding of the processes, systems, and controls that NCUA has implemented or plans to implement to report financial and payment data in accordance with the requirements of the DATA Act. This understanding is necessary for the IG to develop an informed methodology for the future IG audits required by the DATA Act or attestation reviews.

We conducted this audit in accordance with performance audit standards contained in *Generally Accepted Government Auditing Standards* (GAGAS), issued 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. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Furthermore, we provided NCUA management officials a discussion draft of this report and included their comments where appropriate.

To accomplish this audit, we conducted fieldwork at NCUA's headquarters in Alexandria, Virginia from April 2016 to November 2016. We interviewed NCUA management and staff. We also obtained and reviewed all applicable laws, regulations, guidelines, directives, and any other regulatory criteria and guidance related to NCUA's responsibilities to report financial and payment information under the DATA Act. Additionally, we assessed NCUA's efforts and formal implementation plans to report financial and payment information under the DATA Act.

### **Prior Audit Coverage**

We did not identify any reports issued by the NCUA OIG within the last five years related to this subject.



## Appendix B: NCUA Management Response



National Credit Union Administration  
Office of the Executive Director

### SENT BY EMAIL

**TO:** Inspector General Jim Hagen  
**FROM:** Executive Director Mark Treichel   
**SUBJ:** OIG Draft Report on Review of NCUA's DATA Act Readiness  
**DATE:** November 10, 2016

Thank you for the opportunity to review and comment on the OIG draft report, Review of NCUA's DATA Act Readiness. We concur with the report and appreciate the professionalism of your staff during the review.

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1775 Duke Street – Alexandria, VA 22314-3428 – 703-518-6320



## Appendix C: CIGIE Letter to Congress



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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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,

A handwritten signature in blue ink that reads "Michael E. Horowitz".

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



## Appendix D: Acronyms and Abbreviations

<b>DATA Act</b>	Digital Accountability and Transparency Act of 2014
<b>CDRLF</b>	Community Development Revolving Loan Fund
<b>CIGIE</b>	Council of the Inspectors General on Integrity and Efficiency
<b>ESC</b>	Enterprise Services Center
<b>FFATA</b>	Federal Funding Accountability and Transparency Act of 2006
<b>GAO</b>	Government Accountability Office
<b>NCUA</b>	National Credit Union Administration
<b>OCFO</b>	Office of the Chief Financial Officer
<b>OGC</b>	Office of General Counsel
<b>OIG</b>	Office of Inspector General
<b>OMB</b>	Office of Management and Budget
<b>OSCUI</b>	Office of Small Credit Union Initiatives
<b>PRISM</b>	Procurement Request Information System
<b>SAM</b>	System for Award Management
<b>SAO</b>	Senior Accountable Officer
<b>Treasury</b>	Department of the Treasury