

# Office of Inspector General

---

---

## DATA Act Readiness Review

A16-03



September 2016

**FEDERAL MARITIME COMMISSION**

---

---

BLANK PAGE



# Federal Maritime Commission Office of Inspector General

## Report Highlights

### *Increased Engagement by the FMC Will be Positive for the Success of Implementation Efforts*

*(DATA Act Readiness Review, September 2016, Assignment 16-03)*

#### **Why We Did This Review**

The objective of this readiness review was to gain an understanding of the processes, systems and controls which the FMC has implemented, or plans to implement, to report Federal agency expenditures and link Federal spending information in accordance with the requirements of the DATA Act. This understanding is necessary for the OIG to develop an informed methodology for the future OIG reviews required by the DATA Act. In addition, the results of this review will enable the OIG to provide suggestions on how to improve the likelihood of compliance with the requirements of the DATA Act prior to full implementation.

#### **Background**

The Digital Accountability and Transparency Act of 2014 (DATA Act) was enacted May 9, 2014 and, among other things, requires that Federal agencies (FMC) report financial and payment data in accordance with data standards established by the Department of Treasury (Treasury) and the Office of Management and Budget (OMB). The data reported will be displayed on a website available to taxpayers and policy makers. In addition, the DATA Act requires that agency Offices of Inspectors General (OIGs) review statistical samples of the data submitted by the agency under the DATA Act and report on the completeness, timeliness, quality and accuracy of the data sampled and the use of the data standards by the agency.

#### **What We Found**

While the OIG recognizes the FMC is largely relying on the implementation efforts of the Bureau of the Fiscal Service (BFS), the OIG believes the FMC should be more actively engaged in the overall implementation of the DATA Act requirements. The OIG's review focused on the first four steps of the Agency 8-Step Plan based on the OMB Memorandum M-15-12. Overall, the OIG found the FMC had not completed, or only partially completed, some of these first four steps.

#### **Suggestions**

1. The FMC's planned update of the DATA Act implementation plan should encompass both the FMC's and the Bureau of the Fiscal Service's responsibilities, and include expanded narrative and cost information; milestones; and project plan of completed and future steps.
2. The FMC DATA Act working group should better define the personnel assigned to the group, as well as their responsibilities. Working group members should have an understanding of who their team members are, and should develop proper communication thereafter to hold regular and necessary meetings.
3. The FMC should establish its own methodology for reviewing data, systems and milestones, to include those completed on their behalf by the Bureau of the Fiscal Service.
4. Consistent with the FMC's stated intentions, the DATA Act Senior Accountable Official (SAO) should be a senior management official with the ability to coordinate across multiple offices, including Budget and Finance, and Procurement.

#### **Corrective Action**

Prior to the release of this final report, the agency generally adopted all four of the OIG suggestions. The agency updated and improved their DATA Act implementation plan, better defined the FMC working group responsible for the DATA Act, and appointed a new DATA Act Senior Accountable Official with the ability to coordinate efforts across multiple offices.

BLANK PAGE

# Table of Contents

<b>INTRODUCTION.....</b>	<b>1</b>
<b>BACKGROUND.....</b>	<b>1</b>
<b>REVIEW OBJECTIVES .....</b>	<b>2</b>
<b>SCOPE AND METHODOLOGY.....</b>	<b>3</b>
<b>CONCLUSIONS &amp; SUGGESTIONS.....</b>	<b>9</b>
<b>Appendix A – CIGIE DATA Act Anomaly Letter .....</b>	<b>10</b>
<b>Appendix B – Agency Implementation Plan October 2015.....</b>	<b>12</b>
<b>Appendix C – Agency Response &amp; August 2016 Revised FMC DATA Act Implementation Plan.....</b>	<b>15</b>

## **INTRODUCTION**

The Digital Accountability and Transparency Act of 2014 (DATA Act) was enacted May 9, 2014 and, among other things, requires that Federal agencies report financial and payment data in accordance with data standards established by the Department of Treasury (Treasury) and the Office of Management and Budget (OMB). The data reported will be displayed on a website available to taxpayers and policy makers. In addition, the DATA Act requires that agency Offices of Inspectors General (OIGs) review statistical samples of the data submitted by the agency under the DATA Act and report on the completeness, timeliness, quality and accuracy of the data sampled and the use of the data standards by the agency.

The DATA Act provides for this oversight by way of the OIGs and the Comptroller General of the United States. That is, the Act requires a series of oversight reports, and these will begin in calendar year 2017.

## **BACKGROUND**

The Federal Maritime Commission (FMC) is an independent Federal agency of the United States government responsible for regulating the U.S. international ocean transportation system for the benefit of the U.S. exporters, importers, and the U.S. consumer. The FMC's mission is to foster a fair, efficient, and reliable international ocean transportation system and to protect the public from unfair and deceptive practices. FMC is an appropriated agency with a fiscal year (FY) 2016 appropriation of \$25,660,000.

The FMC is directed by five commissioners nominated by the President and confirmed by the Senate, each serving a staggered five-year term. No more than three members of the Commission may be from the same political party. The President designates one commissioner to serve as Chairman. In FY 2015, the FMC was authorized 124 full-time equivalents (FTEs), and had 121 employees onboard at fiscal year's end. The majority of these employees are located in Washington, D.C., with a small number of personnel stationed in major U.S. seaport locations in Houston, Los Angeles, New Orleans, New York/New Jersey, Seattle/Tacoma, and South Florida.

The FMC has an interagency agreement with the Bureau of the Fiscal Service (BFS) to provide full service accounting and financial reporting services. BFS maintains the financial accounts of the FMC and prepares its financial statements. According to the FMC, BFS' Administrative Resource Center (ARC) will largely handle implementation efforts for the DATA Act on the FMC's behalf, with FMC oversight and input. In addition, the National Finance Center (NFC) is FMC's Federal Shared Service Provider (FSSP) for personnel and payroll processing. All requisitions and procurement documents are entered into BFS' PRISM system by FMC's Contracting Specialist, Contracting Officer and staff.

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) identified a timing anomaly with the oversight requirements contained in the DATA Act. That

is, the first Inspector General (IG) reports are due to Congress in November 2016; however, Federal agencies are not required to report spending data until May 2017. To address this reporting date anomaly, the OIGs 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 IG reports, CIGIE is encouraging OIGs 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 IG reporting date anomaly and communicated it to the Senate Committee on Homeland Security and Governmental Affairs and the House Committee on Oversight and Government Reform. Appendix A contains a copy of this letter.

The IG community, through the Federal Audit Executive Council (FAEC) stood up the FAEC DATA Act Working Group (Working Group). On December 03, 2015, the Working Group issued the DATA Act Readiness Review Guide (version 1.0) to assist OIGs in their readiness reviews. That guide concentrated on steps 1 through 4 of the “Agency 8-Step Plan” as described in the DATA Act Implementation Playbook (version 1.0). In addition, the FAEC produced the DATA Act Readiness Review guide version 2.0 on June 02, 2016, which includes procedures for the OIGs’ review on each of the 8 steps from the original implementation plan. This OIG review focused on steps 1 through 4 of the “Agency 8-Step Plan” per Office of Management and Budget Memorandum M-15-12, Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable, and M-10-06, Open Government Directive. Further, the OIG focused the review on the FMC’s actions to date, future plans, and oversight of their DATA Act implementation service provider, the Bureau of the Fiscal Service.

## **REVIEW OBJECTIVES**

The objective of the readiness review was to gain an understanding of the processes, systems and controls which the Federal Maritime Commission (FMC) has implemented, or plans to implement, to report Federal agency expenditures and linking Federal spending information in accordance with the requirements of the DATA Act. This understanding is necessary for the OIG to develop an informed methodology for the future OIG reviews required by the DATA Act. In addition, the results of this review will enable the OIG to provide suggestions on how to improve the likelihood of compliance with the requirements of the DATA Act prior to full implementation.

## **SCOPE AND METHODOLOGY**

To accomplish the objectives of this review, the OIG initiated this DATA Act Readiness Review on June 15, 2016 and performed the following review steps:

- Obtained an understanding of the laws, directives, and any other regulatory criteria (and guidance) related to FMC's responsibilities to report financial and payment information under the DATA Act.
- Obtained an understanding of the FMC governance structure, processes, and controls planned and/or established using a questionnaire and meetings with the individuals responsible for the implementation of the DATA Act at the agency-level, to include the FMC's Senior Accountable Official (SAO).
- Identified the major reporting components within the agency responsible for implementation of the DATA Act.
- Assessed FMC's efforts and formal implementation plans to report financial and payment information under the DATA Act.

The OIG performed the review using the FAEC's DATA Act Working Group's Readiness Review Guide version 2.0, June 02, 2016. The Readiness Review Guide incorporates guidance from the Office of Management and Budget, to include Memoranda M-15-12 and M-10-06. The table that follows provides a series of checklists for each implementation step based on guidance from OMB and the Department of Treasury. Based on meetings and a written questionnaire, the OIG obtained information from the FMC on their progress and future implementation plans. The OIG's assessment and comments are included in the table on the following pages.



## Step 1 Checklist – Organize Team

Milestone	Details	Initial OMB Suggested Timeline	OIG Comments
<b>Designate Senior Accountable Official (SAO)</b>	SAO is responsible for their agency’s implementation, which includes overseeing the governance and progress of the workgroup.	Spring 2015	<i>At the time of the OIG review, the FMC’s DATA Act SAO is the Director of the Office of Budget and Finance (OBF). Because the OBF Director is not responsible for oversight of the procurement office, a component of the DATA Act implementation, the SAO should be a higher level management official. At the time of this review, the FMC indicated a plan to designate the Managing Director/Chief Financial Officer as the SAO.</i>
<b>Form workgroup</b> with subject matter experts (SMEs)	In addition to SMEs, be sure to identify and engage with key stakeholders, including Federal Shared Service Providers (FSSPs), agencies with similar business lines or systems, and your Inspector General.	Spring 2015	<i>The FMC had not formally identified members of a DATA Act working group. The FMC advised the OIG that an updated DATA Act implementation plan being drafted will identify the position titles of the working group members.</i>
<b>Review 8 Step Plan</b> and develop agency roadmap/project plan	Determine key agency implementation milestones, a workgroup governance structure, and roles and responsibilities of people and offices within your agency.	Spring 2015	<i>The FMC developed an implementation plan, dated October 2015. However, the plan lacks sufficient narrative detail, and does not include milestones to monitor progress. The OIG understands the FMC is currently updating their implementation plan.</i>

## Step 2 Checklist – Review Elements

Milestone	Details	Initial OMB Suggested Timeline	OIG Comments
<b>Read</b> May OMB policy guidance (M-15-12)	Read guidance and identify key requirements, along with remaining questions and clarifications needed from OMB and Treasury. OMB guidance is available at: <a href="https://www.whitehouse.gov/sites/default/files/omb/memorand/2015/m-15-12.pdf">https://www.whitehouse.gov/sites/default/files/omb/memorand/2015/m-15-12.pdf</a> .	Spring 2015	<i>The OIG identified evidence that the FMC’s SAO and other staff received guidance and key requirements provided by OMB, Treasury, and their FSSP.</i>
<b>Review standards</b> for data elements	Treasury and OMB are posting data standards online. Agencies can also review the existing USAspending.gov data elements, which need to be captured in addition to the standardized elements.	May – September 2015	<i>Step 2 of the FMC’s October 2015 implementation plan states that the Commission’s DATA Act working group will review the list of DATA Act elements identified by ARC and, if necessary or appropriate, will participate with ARC in data definitions standardization. The OIG could find no evidence that the FMC has completed this step.</i>
<b>Communicate</b> feedback and questions to OMB and Treasury	Agencies have an opportunity to provide feedback on OMB/Treasury policy decisions through advisory councils and Treasury.	May – September 2015	<i>According to the FMC, there have been no specific questions submitted to OMB or Treasury.</i>

### Step 3 Checklist – Inventory Data

Milestone	Details	Initial OMB Suggested Timeline	OIG Comments
<b>Locate</b> DATA Act elements, agency/FSSP systems	Identify and understand linkages and/or gaps in how DATA Act elements are captured in the financial and management award systems. Some helpful resources include— Data inventory template and Blueprints and Blueprint guides.	March – September 2015	<i>The OIG understands that the FMC has relied on their FSSP (BFS) to review data linkages. The OIG has evidence that their FSSP (BFS) identified these linkages on their customers' behalf.</i>
<b>Document systems, processes, and policies</b> for each element	Gather relevant subject matter experts, data dictionaries, and other technical documentation and planning in order to inventory how its elements, sources, processes, regulations, and policies fit together. Document the role of FSSPs and enterprise resource planning (ERP) vendors, along with planning migration and changes to information technology systems.	June – September 2015	<i>Step 3 of the FMC's October 2015 implementation plan states that the Commission's DATA Act working group will perform an inventory of data and associated business processes managed by the FMC. The OIG could not find evidence that the FMC has completed this step. The FMC's FSSP (BFS) has identified changes to information technology systems at the FSSP and communicated this to FMC.</i>
<b>Identify gaps</b> in agency systems and processes	(Re)review DATA Act requirements and finalized data standards and identify anticipated gaps in completeness of data, such as whether award ID, object class, and program activity are recorded in financial systems.	July – September 2015	<i>Based on information provided by the SAO to the OIG, the FMC's FSSP (BFS) has identified data gaps at the FSSP and reported this to FMC.</i>

## Step 4 Checklist – Design and Strategize

Milestone	Details	Initial OMB Suggested Timeline	OIG Comments
<p><b>Establish leads</b> and/or integrate project teams; plan to capture all DATA Act elements; and plan linkage of core financial and mixed feeder management systems by award ID</p>	<p>Establish some leads and/or smaller integrated project teams that will work to develop solutions to fill each specific gap in agency data; develop options for any gaps in the completeness and accuracy of the DATA Act; and develop options for any gaps in the linkage of financial and non-financial DATA Act elements.</p>	<p>August – December 2015</p>	<p><i>According to the SAO, the FMC will rely on BFS to complete these requirements.</i></p>
<p><b>Update implementation plans</b> and submit to OMB</p>	<p>After an initial inventory of DATA Act elements, processes, and systems, agency workgroups should update the DATA Act implementation plans.</p>	<p>March – September 2015</p>	<p><i>The OIG has received the FMC's original implementation plan dated October 2015. The OIG has also identified that as of July 2016, the FMC is making revisions to the plan.</i></p>
<p><b>Build "mapping engine"</b> and "validation engine"</p>	<p>Map data from the Agency Schema (original format) to the DATA Act Schema and apply basic validation rules to verify data are accurate and consistent with the DATA Act Schema metadata.</p>	<p>October 2015 – February 2016 (update iteratively)</p>	<p><i>According to the SAO, the FMC will rely on BFS to complete these requirements.</i></p>
<p><b>Build interface</b> that provides validation reports and other desired functionality to end users; and build method to <b>retrieve data</b> from agency and government-wide sources</p>	<p>The interface allows data stewards within the agency to receive validation reports and provides other functionality; and components can retrieve data from multiple agency systems and government-wide systems.</p>	<p>Winter / spring 2016 (update iteratively)</p>	<p><i>According to the SAO, the FMC will rely on BFS to complete these requirements.</i></p>

<b>Milestone</b>	<b>Details</b>	<b>Initial OMB Suggested Timeline</b>	<b>OIG Comments</b>
Build method to <b>transfer data</b> between agency data store/broker to Treasury; <b>test mapping</b> to DATA Act Schema; and test submission process to Treasury	This component will transfer data from the agency to the government-wide repository at Treasury; sample, and test validity for data and compliance with DATA Act standard; and verify data are accurately and consistently transferred to Treasury.	Spring/summer/fall 2016 (update iteratively)	<i>According to the SAO, the FMC is relying on BFS to transfer their data, and test its mapping and submission.</i>
<b>Analyze data</b> in DATA Act Schema to inform future planning	Analyze data to inform future system updates, process changes, and agency planning and policy.	Ongoing	<i>According to the SAO, the FMC will rely on BFS to complete this requirement.</i>
<b>Update source systems</b> to capture DATA Act elements and required linkages	Start to make needed system changes to link financial and mixed feeder systems by award ID. Also make additional system changes to resolve gaps identified by the data inventory and DATA Act implementation planning process.	October 2015 – February 2017	<i>According to the SAO, the FMC will rely on BFS to complete this requirement.</i>
<b>Re-test</b> data transfer processes as needed	As new data are captured, re-test IT architecture that retrieves data and maps to the DATA Act Schema.	Late 2016 / early 2017	<i>According to the SAO, the FMC will rely on BFS to complete this requirement.</i>
<b>Submit</b> to Treasury	Be sure to verify data are fully submitted.	Early 2017	<i>Successful completion of these milestones is necessary for implementation.</i>

## CONCLUSIONS & SUGGESTIONS

While the OIG recognizes the FMC is largely relying on the implementation efforts of the Bureau of the Fiscal Service (BFS), the OIG believes the FMC should be more actively engaged in the overall implementation of the DATA Act requirements. The OIG's review focused on the first four steps of the Agency 8-Step Plan based on the Office of Management and Budget's Memorandum M-15-12. Overall, the OIG found the FMC had not completed, or only partially completed, some of these first four steps. Increased engagement by the FMC will be positive for the success of implementation efforts. In this regard, the OIG provides the following suggestions for improvement:

1. The FMC's planned update of the DATA Act implementation plan should encompass both the FMC's and the Bureau of the Fiscal Service's responsibilities, and include expanded narrative and cost information; milestones; and project plan of completed and future steps.
2. The FMC DATA Act working group should better define the personnel assigned to the group, as well as their responsibilities. Working group members should have an understanding of who their team members are, and should develop proper communication thereafter to hold regular and necessary meetings.
3. The FMC should establish its own methodology for reviewing data, systems and milestones, to include those completed on their behalf by the Bureau of the Fiscal Service.
4. Consistent with the FMC's stated intentions, the DATA Act Senior Accountable Official (SAO) should be a senior management official with the ability to coordinate across multiple offices, including the Office of Budget and Finance, and Procurement.

Prior to the release of this final report, the agency generally adopted these four suggestions. The agency updated and improved their DATA Act implementation plan, better defined the FMC working group responsible for the DATA Act, and appointed a new DATA Act Senior Accountable Official with the ability to coordinate efforts across multiple offices.

## Appendix A – CIGIE DATA Act Anomaly Letter



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

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

**Page 2**

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

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

We have kept GAO officials informed about our plan to delay the first Inspector General reports

for one year, which they are comfortable with, and our ongoing efforts to help ensure early engagement through Inspector General readiness reviews.

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

Sincerely,



Michael E. Horowitz  
Chair, Council of the Inspectors General on Integrity and Efficiency  
Inspector General, U.S. Department of Justice

cc: The Honorable David Mader, Controller, OMB  
The Honorable Gene Dodaro, Comptroller General, GAO



## Appendix B – Agency Implementation Plan October 2015



### FEDERAL MARITIME COMMISSION DATA ACT IMPLEMENTATION PLAN OCTOBER 2015

---

#### I. Introduction

In May 2015, the Office of Management and Budget issued M-15-12, *Memorandum on Increasing Transparency of Federal Spending by Making Data Accessible, Searchable, and Reliable*. The Administration's goal in issuing the Memorandum is "to ensure that the Government wisely uses each taxpayer dollar to the maximum effect." M-15-12 at 2. The memorandum provides guidance for requirements under the Digital Accountability and Transparency Act of 2014 (DATA Act). The Federal Maritime Commission (FMC or Commission) is committed to fiscal responsibility and transparency. The Commission has developed its DATA Act implementation plan with input from its Federal Shared Service Provider (FSSP).

The plan consists of (1) a timeline of tasks and steps towards implementation; (2) a cost estimate for the tasks and steps; (3) a narrative of the required steps, any fundamental assumptions, and potential difficulties; and (4) the Commission-specific project plan.

#### II. Timeline

The Administrative Resource Center, Fiscal Service (ARC) is the Commission's Federal Shared Service Provider (FSSP). The Commission participates as appropriate in the ARC's plan. The FMC's Office of Budget and Finance (OBF) monitors the ARC's efforts and communicates with ARC to ensure the Commission is on target with the DATA Act's requirements.

ARC reports that it is analyzing the requirements of the DATA Act to identify and strategize necessary changes and solutions to meet the required due dates for DATA Act reporting in fiscal year 2016 and 2017. ARC is following the 8 step agency implementation playbook and timelines provided by the DATA Act Program Office in May 2015 (see Appendix 1).

ARC anticipates making the following system or process changes to the ARC shared services offering based upon current developing requirements and the inventory of data elements performed by ARC:

- Modification of the Oracle E-business Suite to capture the Program Activity Code/Description fields by March 2016
- Modification of the Compusearch Prism, Oracle E-business Suite, and related interfaces to capture the Award ID code/description field on reportable contract, award, grant and loan obligations, and to improve the accuracy of management data reporting to FPDS-NG by May 2017
- Development of data extracts from the system platform to perform DATA Act reporting by the various due dates

- Development of a solution for exchanging, linking, validating, and reporting data in the required format by May 2017

### III. Estimate

The FMC's FSSP anticipates that the increased costs will be reflected in their Reporting Services beginning in FY17 and represent the accountant time in performing the new reporting for a fiscal year. The cost of any changes to the system platform will likely be from available reserves. No specific line item on the cost schedule is anticipated. Please note that the final requirements have not yet been determined and therefore the solution has not been finalized, so the estimate provided is a high level estimate, subject to change.

The FMC's budget estimate is: \$13,000.

Additional internal-agency resources for FMC activities will be provided as a collateral duty by existing staff. The above estimate does not include Commission personnel costs, however, it is anticipated that the majority of the effort will be done by the FSSP.

### IV. Narrative

The FMC participates with its FSSP to ensure compliance with the DATA Act and appropriate implementation. The Commission does not have any grant services, and the focus of the Commission's DATA Act compliance is on financial and procurement actions.

ARC has completed the Data Element Inventory, finding two gaps in the data elements that need to be addressed: the Award ID- PIID for contracts and FAIN for assistance, and the Program Activity and Code. ARC has begun the process of evaluating Award ID and determining an adequate solution to incorporate the Award ID into the Financial System which will function as the link between financial and non-financial information. Additionally, ARC found the Program Activity and Code present a challenge. These are the programs and codes found in the Program & Financing Schedule in the President's Budget Appendix, and are not always a one-to-one relationship in the financial system. ARC reports that it is almost complete in the information gathering step in determining how each agency determines their Program. With this information, ARC will be designing and implementing a table in order to produce this information for the specifics of the FMC.

ARC reports that it is actively working to produce the files that are needed for FY16Q1 and Q2 reporting. Quarter 1 will include a summary of obligations by BOC, per requirements in OMB A-11. Quarter 2 will build on the requirements from Q1 and add Program Activity and Code. These are currently in development and testing phases.

### V. Project Plan

The FMC will follow the 8-step Implementation Plan for its internal decisions.

- 1) Organize team. The FMC will established a DATA Act working group. The group will be comprised of staff from the Office of Budget and Finance, the Office of Management Services, and the Office of the Managing Director. The Director, OBF will be the group's leader and is responsible for ensuring implementation of the Commission's plan and that the ARC's Commission-related actions are appropriate. The working group will meet to track ARC's progress and to determine what, if any, additional actions are needed to be completed by the FMC.
- 2) Review elements. The Commission's DATA Act working group will review the list of DATA Act elements identified by ARC and, if necessary or appropriate, will participate with ARC in data definitions standardization.
- 3) Inventory data. The Commission's DATA Act working group will perform inventory of data and associated business processes managed by the FMC.
- 4) Design and strategize. In conjunction with ARC's implementation strategy and plan, the Commission's DATA Act working group will conduct an assessment of its existing systems and create, if not created by the FSSP, a link between the financial system and the FMC's contracting system. This link will capture complete multi-level (e.g., summary and award) detail. The Award ID for both systems will be identical and will be entered into USAspending.gov.
- 5) Execute broker. As necessary, the FMC's DATA Act working group will work to ensure the mapping of data from the ARC's preexisting schema to the DATA Act schema is completed.
- 6) Test broker implementation. As necessary, the FMC's DATA Act working group will review and communicate with ARC to ensure that the broker outputs are valid iteratively.
- 7) Update systems. The FMC's DATA Act working group will review any other system changes that need to be completed and provide for their update. The working group will request the assistance of the FMC's Office of Information Technology as appropriate.
- 8) Submit data. When ARC has completed its required actions and data is ready to be submitted, OBF will communicate with ARC and complete any agency actions required to submit data.

## Appendix C – Agency Response & August 2016 Revised FMC DATA Act Implementation Plan

UNITED STATES GOVERNMENT

FEDERAL MARITIME COMMISSION

### Memorandum

**TO** : Inspector General

**DATE:** September 9, 2016

**FROM** : Managing Director

**SUBJECT** : DATA Act Readiness Review

Management appreciates the Inspector General's comprehensive review of the Commission's readiness to comply with the reporting requirements of the Digital Accountability and Transparency Act of 2014 (DATA Act). The suggestions made have enabled the DATA Act Working Group to revise the Commission's original DATA Act Implementation Plan into a more fully developed and robust product. Please find attached FMC's Revised DATA Act Implementation Plan.

As you have noted, the FMC is working closely with the Administrative Resource Center (ARC), a component office of the Bureau of the Fiscal Service (BFS), to ensure timely implementation of the DATA Act reporting requirements beginning in May 2017. As our financial services provider, ARC regularly communicates with our Office of Budget and Finance and the parties jointly track progress made.

As suggested, the Commission's updated Plan includes an expanded narrative, and incorporates OMB's 8-step implementation plan, milestones (and current status) for each step, available cost information, and memorializes the ARC's responsibilities and accomplishments for each. The FMC Working Group and its members' responsibilities have been clearly defined. The Managing Director will serve as Senior Accountable Official (SAO) for the DATA Act, as a senior management official having the ability to coordinate across multiple offices, including the Office of Budget and Finance and the Office of Management Services with respect to procurement issues.

Karen V. Gregory

Attachment: Revised DATA Act Implementation Plan



## **Federal Maritime Commission**

DATA Act Implementation Plan

Revised – August 2016

## Table of Contents

I.	Introduction .....	1
II.	Timeline.....	1
III.	Estimate .....	2
IV.	Narrative .....	2
V.	FMC Project Plan.....	3
	Appendix I: ARC Data Act Project Agency 8-Step Plan Status.....	6



# Federal Maritime Commission DATA Act Implementation Plan Revised - August 2016

## I. Introduction

In May 2015, the Office of Management and Budget issued M-15-12, *Memorandum on Increasing Transparency of Federal Spending by Making Data Accessible, Searchable, and Reliable*. The Administration's goal in issuing the Memorandum is "to ensure that the Government wisely uses each taxpayer dollar to the maximum effect." M-15-12 at 2. The memorandum provides guidance for requirements under the Digital Accountability and Transparency Act of 2014 (DATA Act). The Federal Maritime Commission (FMC or Commission) is committed to fiscal responsibility and transparency. The Commission has developed its DATA Act Implementation Plan with input from its Federal Shared Service Provider (FSSP).

This plan, updating the initial October 2015 plan, consists of (1) a timeline of tasks and steps towards implementation; (2) a cost estimate for the tasks and steps; (3) a narrative of the required steps, any fundamental assumptions, and potential difficulties; and (4) the Commission-specific project plan.

## II. Timeline

The Administrative Resource Center, Fiscal Service (ARC) is the Commission's Federal Shared Service Provider (FSSP). The Commission participates as appropriate in the ARC's plan. The FMC's Office of Budget and Finance (OBF) monitors the ARC's efforts and communicates with ARC to ensure the Commission is on target with the DATA Act's requirements.

ARC reports that it is analyzing the requirements of the DATA Act to identify and strategize necessary changes and solutions to meet the required due dates for DATA Act reporting in fiscal year 2016 and 2017. ARC is following the 8 step agency implementation playbook and timelines provided by the DATA Act Program Office in May 2015.

ARC anticipates making the following system or process changes to the ARC shared services offering based upon current developing requirements and the inventory of data elements performed by ARC:

- Modification of the Oracle E-business Suite to capture the Program Activity Code/Description fields
- Modification of the Compusearch Prism, Oracle E-business Suite, and related interfaces to capture the Award ID code/description field on reportable contract, award, grant and loan

obligations, and to improve the accuracy of management data reporting to FPDS-NG by May 2017

- Development of data extracts from the system platform to perform DATA Act reporting by the various due dates
- Development of a solution for exchanging, linking, validating, and reporting data in the required format by May 2017

ARC is on track to meet the above requirements and reported on July 16, 2016 that they had completed Steps 1-4 of their 8-Step Plan, attached in their updated plan status, as Appendix 1, and that Steps 5-8 were in progress.

### III. Estimate

The FMC's FSSP anticipates that the increased costs will be reflected in their Reporting Services beginning in FY17 and represent the accountant time in performing the new reporting for a fiscal year. The cost of any changes to the system platform will likely be from available reserves. No specific line item on the cost schedule is anticipated. Please note that the final requirements have not yet been determined and therefore the solution has not been finalized, so the estimate provided is a high level estimate, subject to change.

The FMC's budget estimate for the increased cost of implementing Reporting Services in FY 2017 is \$13,000. The FMC will update the budget estimate when additional cost information is provided by ARC for future fiscal years.

Additional internal-agency resources for FMC activities will be provided as a collateral duty by existing staff. The above estimate does not include Commission personnel costs, however, it is anticipated that the majority of the effort will be done by the FSSP.

### IV. Narrative

The FMC has active, ongoing interagency agreements with both ARC (for providing full service accounting and financial reporting services) and the National Finance Center (for providing personnel and payroll processing). The FMC participates with ARC to ensure compliance with the DATA Act and appropriate implementation. The Commission does not have any grant services, and the focus of the Commission's DATA Act compliance is on financial and procurement actions.

ARC has completed the Data Element Inventory, finding two gaps in the data elements that need to be addressed: the Award ID- PIID for contracts and FAIN for assistance, and the Program Activity and Code. ARC has begun the process of evaluating Award ID and determining an adequate solution to incorporate the Award ID into the Financial System which will function as the link between financial and non-financial information. Additionally, ARC found the Program Activity and Code present a challenge. These are the programs and codes found in the Program & Financing Schedule in the President's Budget Appendix, and are not always a one-to-one relationship in the financial system. ARC reports that it is almost complete in the information gathering step in determining how each agency determines their Program. With this information, ARC will be designing and implementing a table in order to produce this information for the specifics of the FMC.



## V. FMC Project Plan

The FMC will follow the following 8-step Implementation Plan for its internal decisions.

- 1) **Organize team.** The FMC established a DATA Act working group. The group is comprised of staff from the Office of the Managing Director (OMD), the Office of Budget and Finance (OBF), and the Office of Management Services (OMS).

The Managing Director/Chief Financial Officer will serve as the Senior Agency Official (SAO) for DATA Act Implementation and is responsible both for ensuring that the ARC's Commission-related actions are appropriate, and for implementing the Commission's plan. The Counsel to the Managing Director and the Special Assistant to the Managing Director will also serve on the working group to provide assistance as needed.

The Director, OBF, will serve as the lead for accounting activity and liaison with ARC.

The Director, OMS, serves as the lead for procurement activity.

The working group will meet monthly, or more frequently as needed, to track ARC's progress and to determine what, if any, additional actions need to be completed by the FMC in order to successfully implement the DATA Act.

### **Step 1 Status: Complete.**

- 2) **Review elements.** The Commission's DATA Act working group will review the list of DATA Act elements identified by ARC as provided, and, if necessary or appropriate, will participate with ARC in data definitions standardization. The FMC's DATA Act working group will provide oversight of the work completed by its FSSP to identify and standardize data definitions applicable to the FMC.

ARC performed an inventory of data elements for the ARC system platform in May 2015 and reviewed inventory as new information was provided. ARC clarified requirements and expectations with both Treasury and OMB, and posted a DATA Act elements and guidance tracker in OMB's MAX database at <https://community.max.gov/x/KoHhNQ>.

### **Step 2 Status: Complete.**

- 3) **Inventory data.** The Commission's DATA Act working group will perform inventory of data and associated business processes managed by the FMC, as identified by its FSSP.

ARC's DATA Act team held work sessions to accomplish this task during April and May, 2015, and documented and shared the results of their review with the FMC. Data element gaps within the ARC system platform were identified in May 2015 as Program Activity and Award ID. The solutions to resolve these gaps in data elements were identified and

implemented by ARC in July 2016. ARC continues to work on developing, improving, and testing its Oracle COTS functionality, and to hold regular briefings on their progress.

**Step 3 Status: Complete.**

- 4) **Design and strategize.** In conjunction with ARC's implementation strategy and plan, the Commission's DATA Act working group will conduct an assessment of its existing systems and create, if not created by the FSSP, a link between the financial system and the FMC's contracting system. This link will capture complete multi-level (e.g., summary and award) detail. The Award ID for both systems will be identical and will be entered into USASpending.gov.

ARC identified and implemented needed business process changes to minimize data errors and discrepancies, and to ensure accurate presentation of data. They will continue to perform USASpending.gov reconciliations and share results with the FMC until DATA Act reporting begins. ARC deployed Program Activity Code functionality in January 2016 and Award ID functionality in July 2016.

**Step 4 Status: Complete.**

- 5) **Execute broker.** As necessary, the FMC's DATA Act working group will work to ensure that the mapping of data from the ARC's preexisting schema to the DATA Act schema is completed.

In late April 2016, ARC received RSS version 1.0 and is continuing to review changes and develop written requirements to develop a solution with their in-house resources. They continue to work to identify needed business process changes to ensure accurate presentation of data in the schema. ARC will continue to perform USASpending.gov reconciliations and sharing results until the new DATA Act reporting begins.

ARC is developing extract files, has gained access to the broker application, and will test DATA Act files when development has been completed. ARC will test Oracle system patches, provide feedback, and coordinate user group calls, as needed, to facilitate communication between Oracle Corporation and the FMC. Program Activity Code functionality developed by ARC was deployed in January 2016 and Award ID functionality in July 2016. These changes will position the ARC platform to have all necessary data elements for DATA Act reporting.

**Step 5 Status: In progress.**

- 6) **Test broker implementation.** As necessary, the FMC's DATA Act working group will review and communicate with ARC to ensure that the broker outputs are valid iteratively.

ARC plans to use the government-wide broker to submit and transfer data files from the ARC system platform, and will follow the processes required by the broker. ARC has

successfully tested test files to the broker to learn capabilities of the system and better understand the processes involved with the broker. ARC is testing the functionality of new patches issued by Oracle Corporation for the Oracle Federal Financials System, and developing system reports to assist in monitoring and troubleshooting data quality. They have successfully submitted test data manually to the government-wide broker for one agency, and continue to test Oracle COTS patches and related output files in the broker. Once Oracle COTS functionality fully meets ARC's needs, it will transition to the COTS functionality.

**Step 6 Status: In progress.**

- 7) **Update systems.** The FMC's DATA Act working group will review any other system changes that need to be completed and provide for their update. The working group will request the assistance of the FMC's Office of Information Technology as appropriate.
- 8) **Submit data.** When ARC has completed its required actions and data is ready to be submitted, OBF will communicate with ARC and complete any agency actions required to submit data.

System integration testing of ARC-developed DATA Act extract files is expected to begin in December 2016, and user acceptance testing is expected to be performed in February 2017. ARC will continue to review updates made to the broker and test new functionality available in the broker – and repeat this step until both ARC systems and the broker are complete and working as intended. ARC has identified resources to perform this work and determined their tentative assignments with regards to the DATA Act reporting responsibilities. ARC will support its customer agencies, as appropriate, in analyzing available data for agency decision-making. ARC will monitor their reporting performance and provide feedback to the FMC on relevant issues.

**Steps 7-8 Status: In progress.**

## Appendix I: ARC Data Act Project Agency 8-Step Plan Status

July 16, 2016

ARC's DATA ACT Project Team was formed in May 2015 and represents a separate project team in support of all of ARC's shared services customer agencies.

We support the following DATA Act initiatives:

- ARC's Standard Shared Services DATA Act solution
- Department of Treasury's DATA Act solution
- Department of Homeland Security's DATA Act solution
- Oracle Corporation's COTS DATA Act solution

Below is our status and planned activities related to the Agency 8-Step Implementation Plan.

### Step 1 Checklist – Organize Team

Milestone	Details
<b>Designate Senior Accountable Official (SAO)</b>	SAO is responsible for their agency's implementation, which includes overseeing the governance and progress of the workgroup.
<b>Form workgroup with subject matter experts (SMEs)</b>	In addition to SMEs, be sure to identify and engage with key stakeholders, including Federal Shared Service Providers (FSSPs), agencies with similar business lines or systems, and your Inspector General.
<b>Review 8-step plan and develop agency roadmap / project plan</b>	Determine key agency implementation milestones, a workgroup governance structure, and roles and responsibilities of people and offices within your agency.

Step 1 Status: Complete

#### Designate Senior Accountable Official (SAO):

- Marty Greiner (Executive Sponsor)
- Matthew Miller (Executive Sponsor)

#### Form workgroup with subject matter experts (SMEs):

Team members are listed below. Core team members are denoted with \*.

- Debbie Daniell (Project Lead)\*
- Rich McFee (Project Lead)\*
- Dana Nelson (Project Manager) \*
- Amanda Cayton (Financial Management) \*
- Scott Chichester (Financial Management) \*
- Noah Sheppard (Financial Management)\*

- Shannon Rhodes (Accounting Support) \*
- Jennifer Dickerson (Accounting Support)\*
- James Nigh (Accounting Support)\*
- Tim Harvey (Business Technology) \*
- Jennifer Cosner (Business Technology)
- Scott Miller (Business Technology) \*
- Eric Aldridge (Business Technology) \*
- Heather Brown (Grants)
- Leslie Thomas (Grants)
- Peggy Grygiel (Grants/Loans)
- Mary Watson (Intragov)
- Paul Larson (Debt)
- Joyce Deem (Vendors and Purchase Cards)
- Brandon Burnworth (Procurement)
- Kathy Estep (Procurement)
- Keri Moore (Procurement)
- Garen Benke (Procurement)
- Michelle Roth (Budget)

**Review 8-step plan and develop agency roadmap/project plan:** The ARC DATA Act team follows ARC's standard project management processes. The core team meets regularly and participates in relevant stakeholder meetings. Monthly Status Reports are maintained and communicated throughout management, and Risks and Issues are tracked and mitigated as appropriate.

## Step 2 Checklist – Review Elements

Milestone	Details
<b>Read</b> May OMB policy guidance (M-15-12)	Read guidance and identify key requirements, along with remaining questions and clarifications needed from OMB and Treasury. OMB guidance is available at: <a href="https://www.whitehouse.gov/sites/default/files/omb/memoranda/2015/m-15-12.pdf">https://www.whitehouse.gov/sites/default/files/omb/memoranda/2015/m-15-12.pdf</a> .
<b>Review DATA Act Definition Standards</b> for data elements	Treasury and OMB posted data standards on <a href="http://fedspendingtransparency.github.io/dataelements/">http://fedspendingtransparency.github.io/dataelements/</a> and finalized data element definitions are available on <a href="https://max.gov/maxportal/assets/public/offm/DataStandardsFinal.htm">https://max.gov/maxportal/assets/public/offm/DataStandardsFinal.htm</a> .  Agencies can also review the existing USAspending.gov data elements, which need to be captured in addition to the standardized elements.
<b>Communicate feedback</b> and questions to OMB and Treasury	Agencies had an opportunity to provide feedback on OMB/Treasury policy decisions through advisory councils such as ACE, FACE, and PCE, along with the IAC. Feedback on data standards can also be submitted on <a href="http://fedspendingtransparency.github.io/">http://fedspendingtransparency.github.io/</a> . Agency may also submit clarification and policy questions to <a href="mailto:DATAPMO@fiscal.treasury.gov">DATAPMO@fiscal.treasury.gov</a> .

## Step 2 Status: Complete

**Read May OMB policy guidance (M-15-12):** The ARC DATA Act team has reviewed and provided feedback on draft and developing guidance, as well as final guidance issued.

**Review DATA Act Definition Standards for data elements:** We performed an inventory of data elements for the ARC system platform in May 2015 and reviewed our inventory as new information was provided.

**Communicate feedback and questions to OMB and Treasury:** We participated in office hour calls and other opportunities to clarify requirements and expectations.

## Step 3 Checklist – Inventory Data

Milestone	Details
<b>Locate</b> DATA Act elements agency/FSSP systems	Identify and understand linkages and/or gaps in how DATA Act elements are captured in the financial and management award systems. Some helpful resources include— <ul style="list-style-type: none"> <li>• Data inventory template and</li> <li>• Blueprints and Blueprint guides.</li> </ul>
<b>Document systems, processes, and policies</b> for each element	Gather relevant subject matter experts, data dictionaries, and other technical documentation and planning in order to inventory how its elements, sources, processes, regulations, and policies fit together.  Document the role of FSSPs and enterprise resource planning (ERP) vendors, along with planning migrations and changes to information technology systems.
<b>Identify gaps</b> in agency systems and processes	(Re)review DATA Act requirements and finalized DATA Act Definition Standards and identify anticipated gaps in completeness of data, such as whether Award ID, object class, and program activity are recorded in financial systems.
<b>Brainstorm potential improvements</b> to agency systems, processes, and policies	Determine ways the agency can potentially tweak systems and process to improve data quality and better streamline agency analytical, management, and reporting compliance activities.

## Step 3 Status: Complete

**Locate DATA Act elements agency /FSSP systems:** The ARC DATA Act team held internal and customer data element work sessions during April and May, 2015 to accomplish this task. The resulting findings were documented and shared with customer agencies.

**Document systems processes, and policies for each element:** We documented our review of data elements and shared our analysis with our customer agencies.

**Identify gaps in agency systems and processes:** Data element gaps within the ARC system platform were identified in May 2015 as Program Activity and Award ID. The solutions to resolve the gaps in data elements identified are planned were implemented in July 2016. We also participated and assisted some of our customer agencies in conducting inventories of their award systems.

**Brainstorm potential improvements to agency improvements to agency systems, processes, and policies:** To be able to meet the DATA Act reporting requirements, as well as reporting timelines required by our stakeholders, ARC is using in-house resources to design and develop extended functionality to ARC's system platform to address these requirements. Once Oracle COTS functionality is fully developed and tested and proven to meet our needs, we will transition to the COTS functionality and abandon our custom solution, with the exception of the custom processes developed to support both Treasury and DHS.

The ARC team discussed policies, practices and procedures to identify areas that will require change as a result of the new requirements. As a result, the team has developed service descriptions, identified staffing requirements, developed procedures and other documentation for new processes and made regular briefings on our progress of the upcoming DATA Act changes integral to several operational and customer meetings.

### Step 4 Checklist – Design and Strategize

Milestone	Details
<b>Establish leads</b> and/or integrated project teams	Establish some leads and/or smaller integrated project teams that will work to develop solutions to fill each specific gap in agency data. Workgroups may also want to identify key programs, offices, or business lines that could be leveraged to pilot specific aspects of agency implementation.
<b>Plan to capture all</b> DATA Act elements	Develop options for addressing gaps in the completeness and accuracy of DATA Act elements. Also, consider how they can best leverage current systems, already scheduled system upgrades, and Federal Shared Service Providers.
<b>Plan linkage</b> of core financial and mixed feeder management systems by award ID	Develop options for addressing gaps in the linkage of financial (e.g., obligated amounts) and non-financial (e.g., place of performance) DATA Act elements.
<b>Submit implementation plans</b> and to OMB	After an initial inventory of DATA Act elements, processes, and systems, agency workgroups submitted their DATA Act implementation plans.

## Step 4 Status: Complete

**Establish leads and/or integrated project teams:** ARC DATA Act team work assignments were identified and assigned during project planning. Progress and issues are reported weekly in the team project meetings.

**Plan to capture all DATA Act elements:** We identified any business process changes needed to minimize data errors and discrepancies, and ensure accurate presentation of the data. We worked with the appropriate parties to implement necessary changes. We will continue performing our USASpending.gov reconciliations and sharing the results with customers until the new DATA Act reporting begins. Program Activity Code functionality was deployed in January 2016 and Award ID functionality in July 2016.

**Plan linkage of core financial and mixed feeder management systems by award:** We have identified dependent customer systems/processes related to DATA Act Files D1 and 2. We maintain communications with those relevant customer agencies to gauge progress and readiness.

**Submit implementation plans to OMB:** DATA Act Implementation Plans were not required to be submitted to OMB by FSSPs. ARC was included in Treasury's Implementation Plan. We provided non-Treasury agencies with the information they needed in order to comply with the request for plans.

## Step 5 Checklist – Preparing Data for Submission to the Broker

Milestone	Details
<b>Review RSS/IDD documentation</b>	Review RSS/IDD with relevant SMEs and other team members as appropriate. Documentation available on MAX at <a href="https://community.max.gov/x/ClbyL">https://community.max.gov/x/ClbyL</a> .
<b>Build "mapping engine" that populates DATA Act Schema with agency data</b>	Map data from the Agency Schema (original format) to the DATA Act Schema. This component should have the capability to link data from disparate systems and transform data into the required DATA Act Schema format.
<b>Build extracts to conform to DATA Act Schema</b>	This component verifies data have accurately been mapped from agency source systems to the DATA Act Schema through the use of data extracts. Modify data required for the Award Submission Portal to align with the D2 file.
<b>Implement system changes to capture data</b>	Sample and test validity for data and compliance with DATA Act Schema utilizing the Broker. Based on results of testing, make plans to improve data quality and tweak the IT architecture and system updates.



## Step 5 Status: In Progress

**Review RSS/IDD:** ARC received RSS version 1.0 in late April 2016. We have spent time reviewing the changes and developing written requirements in order to develop the solution with our in-house resources. This effort is currently underway.

**Build “mapping engine” that populates DATA Act Schema with agency data:** We are identifying any business process changes needed to minimize data errors and discrepancies, and ensure accurate presentation of the data in the schema. We are working with the appropriate parties to implement necessary changes. We will continue performing our USASpending.gov reconciliations and sharing the results with customers until the new DATA Act reporting begins.

**Build extract to conform to DATA Act Schema:** Development of extract files are in progress. We have gained access to the broker application and will test our DATA Act files, when developed.

**Implement system changes to capture data:** We will test Oracle system patches, provide feedback, and coordinate user group calls, as needed, to facilitate communication between Oracle Corporation and user agencies.

Program Activity Code functionality developed by ARC was deployed in January 2016 and Award ID functionality in July 2016. These changes will position the ARC platform to have all of the necessary data elements for DATA Act reporting.

## Step 6 Checklist –Test Broker Outputs and Ensure Data are Valid

Milestone	Details
Build method to <b>retrieve data</b> from agency systems	This component retrieves data from multiple agency systems. Agency may wish to design the IT solution to be able to transfer data in both directions between the source systems and a centralized data store/Broker within the agency.
Utilize Broker <b>"validation engine"</b> that verifies mapping to DATA Act Schema	This component verifies data have accurately been mapped from agency source systems to the DATA Act Schema. It will apply basic validation rules to verify data are accurate and consistent with the DATA Act Schema metadata.
<b>Revise extracts</b> to correct for any errors generated by the Broker	Agency will be able to confirm errors generated by the Broker to ensure that data submissions are valid.
Build method to <b>transfer data</b> between agency data store/Broker to Treasury	This component will transfer data from the agency to the government-wide repository at Treasury. Utilize Broker to test the transfer method with sample data.
<b>Test submission</b> process to Treasury	Verify data are accurately and consistently transfer to Treasury. Also make sure data conform with Treasury and agency IT security protocols.

### Step 6 Status: In progress

**Build method to retrieve data from agency systems:** ARC plans to use the government-wide broker to submit and transfer data files from the ARC system platform. We will follow the processes required by the broker.

**Utilize Broker "validation engine" that verifies mapping to DATA Act Schema:** We have successfully tested test files to the broker to learn the capabilities and better understand the processes involved with the broker. We have reviewed the available error reports and provided feedback to the DATA Act PMO team.

Additionally, we are participating in the testing of the Treasury and DHS DATA Act solutions, and providing feedback, as necessary, for those solutions. As new patches are issued by Oracle Corporation for the Oracle Federal Financials System, we will test the related functionality, including the submission of test files to the broker, as applicable.

**Revise extracts to correct for any errors generated by the Broker:** Capabilities and processes involved with the broker and Treasury/DHS solutions will be considered when developing our internal operating procedures for performing the DATA Act reporting for our customer agencies.

We are developing system reports to assist in monitoring and troubleshooting data quality as we prepare the related data extracts. We will develop feedback processes with our partners to communicate and resolve data errors that are detected.

**Build method to transfer data between agency data store/Broker to Treasury:** We have also provided test files to both Treasury and DHS for their custom solutions and we will continue supporting their projects by submitting files, as planned, and taking appropriate corrective actions to address any deficiencies. Data is transferred to the Treasury/DHS solutions by manual upload by Reporting Accountants. The transfer of the data between the ARC system platform and the government-wide broker will be dependent on the capabilities of the broker, which are not fully known at this time.

**Test submission process to Treasury:** We will continue to test files and learn about the capabilities of the government-wide broker application and both the Treasury and DHS Data Act solutions. ARC has successfully submitted test data manually to the government-wide broker for one agency.

As we test available Oracle COTS patches, we will test related output files in the broker.

Once Oracle COTS functionality is fully developed and tested and proven to meet our needs, we will transition to the COTS functionality and abandon our custom solution, with the exception of the custom processes developed to support both Treasury and DHS.

### Steps 7-8 Checklist – Update and Submit

Milestone	Details
<b>Test submission process to Treasury</b>	Verify data are accurately and consistently transfer to Treasury. Also make sure data conform with Treasury and agency IT security protocols.
<b>Re-test data transfer processes as needed</b>	As new data are captured, re-test IT architecture that retrieves data and maps to the DATA Act Schema.
<b>Submit to Treasury</b>	Be sure to verify data are fully submitted.  Update agency plans and system updates as needed to improve transparency and operational effectiveness.
<b>Analyze data in DATA Act Schema to inform future planning and policy</b>	Analyze data in agency data mapped to DATA Act Schema to inform future system updates, process changes, and agency planning and policy.

Steps 7-8 Progress: In progress

**Test submission process to Treasury:** System integration testing of ARC-developed Data Act extract files is expected to begin in December 2016 and user acceptance testing is expected to be performed in February 2017.

**Re-test data transfer processes as needed:** We will continue to review updates made to the broker and test new functionality available in the broker. ARC will be repeating this step as updates are made to both broker and our systems, until they are both complete and working as intended.

**Submit to Treasury:** We have identified ARC resources that will perform this work and determined their tentative assignments with regards to DATA Act reporting responsibilities. We will provide training and procedural instructions to our report preparers, and establish performance expectations with regards to reporting responsibilities. This will be accomplished near go live, when the reporting business processes involved have been completed.

**Analyze data in DATA Act Schema to inform future planning and policy:** We will support our customer agencies, as appropriate, in analyzing available data for agency decision-making. We will monitor our reporting performance and those of our reporting partners and provide feedback to customer agencies on relevant issues.