

OFFICE OF INSPECTOR GENERAL
U.S. Agency for International Development

USAID Complied in Fiscal Year 2021 With the Digital Accountability and Transparency Act of 2014

Audit Report 0-000-22-002-C
November 6, 2021





OFFICE OF INSPECTOR GENERAL U.S. Agency for International Development

MEMORANDUM

DATE: November 6, 2021

TO: USAID, Chief Financial Officer, Reginald W. Mitchell

FROM: Deputy Assistant Inspector General for Audit, Alvin Brown /s/

SUBJECT: USAID Complied in Fiscal Year 2021 With the Digital Accountability and Transparency Act of 2014 (0-000-22-002-C)

Enclosed is the final audit report on U.S. Agency for International Development (USAID) compliance in fiscal year (FY) 2021 with the Digital Accountability and Transparency Act of 2014 (DATA Act). The Office of Inspector General (OIG) contracted with the independent certified public accounting firm of Brown & Company Certified Public Accountants and Management Consultants PLLC (Brown & Company) to conduct the performance audit. The contract required the audit firm to perform the audit in accordance with generally accepted government auditing standards and the Council of the Inspectors General on Integrity and Efficiency Federal Audit Executive Council "Inspectors General Guide to Compliance under the DATA Act," dated December 4, 2020.

In carrying out its oversight responsibilities, OIG reviewed the audit firm's report and related audit documentation and inquired of its representatives. The audit firm is responsible for the enclosed auditor's report and the conclusions expressed in it. We found no instances in which Brown & Company did not comply, in all material respects, with applicable standards.

The audit objectives were to (1) assess the completeness, accuracy, timeliness, and quality of FY 2020, fourth quarter (September 30, 2020) financial and award data submitted to the U.S. Department of the Treasury (Treasury) for publication on USAspending.gov; and (2) assess USAID's implementation and use of the Government-wide financial data standards established by the Office of Management and Budget (OMB) and Treasury. To answer the audit objectives, Brown & Company tested a statistical sample of 238 records from a population of 7,165 records. The audit firm assessed the internal controls over financial reporting for the DATA Act, reviewed and reconciled summary-level data submitted by USAID for publication on USAspending.gov, assessed implementation and use of the 59 data elements/standards established by OMB and Treasury, and assessed the completeness, timeliness, accuracy, and quality of the financial and award data sampled.

The audit firm concluded that USAID complied with the requirements of the DATA Act. Brown & Company also determined that (1) the USAID data reported for the fourth quarter of FY 2020 for publication on USAspending.gov were substantially complete, timely, accurate, and of high quality; and (2) USAID implemented and used the Government-wide financial data

standards as established by OMB and Treasury, as applicable. In addition, however, Brown & Company's testing results found exceptions in the completeness, accuracy, and timeliness of data elements. The auditors made two recommendations to improve the completeness, accuracy, and timeliness of data elements and strengthen USAID's internal controls over its DATA Act reporting.

To address the weaknesses identified in the report, we recommend that USAID's Chief Financial Officer:

Recommendation 1. Improve procedures to ensure the USAID system data (Phoenix and GLAAS) for the DATA Act submission is consistent with supporting documents, as applicable.

Recommendation 2. Improve procedures to ensure that executed contracts and procurement documents are uploaded into ASIST and are available to validate timeliness of data elements.

In finalizing the report, the audit firm evaluated USAID's responses to the recommendations. After reviewing that evaluation, we consider recommendation 1 and 2 resolved but open pending completion of planned activities. For recommendations 1 and 2, please provide evidence of final action to the Audit Performance and Compliance Division.

We appreciate the assistance provided to our staff and the audit firm's employees during the engagement.

**United States Agency for International Development
Independent Auditor's Report on the Compliance with the
Digital Accountability and Transparency Act of 2014
Submission Requirements for Fiscal Year 2021**



November 4, 2021

**Prepared by:
Brown & Company Certified Public Accountants and
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Independent Auditor's Report

Office of Inspector General
United States Agency for International Development
Washington, DC

Reginald W. Mitchell, Chief Financial Officer
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The Office of Inspector General (OIG) United States Agency for International Development (USAID) contracted Brown & Company CPAs and Management Consultants, PLLC to conduct a performance audit of USAID's compliance with the Digital Accountability and Transparency Act of 2014 (DATA Act). To clarify the reporting requirements under the DATA Act, the Office of Management and Budget (OMB) and U.S. Department of Treasury (Treasury) published 59 data definition standards and required Federal agencies to report financial and award data on USAspending.gov.

Our scope is to test USAID's Fiscal Year (FY) 2020 fourth quarter (Q4) financial and award data as of September 30, 2020, which meets the following requirements: (1) the test quarter must fall within the range of FY 2020 third quarter through FY 2021 second quarter; (2) is representative of agency spending; (3) includes pandemic-related spending transactions; and (4) allows sufficient time to meet the mandatory audit deadline.

The audit objectives were to assess (1) completeness, accuracy, timeliness, and quality of USAID's FY 2020 Q4 financial and award data submitted to Treasury for publication on USAspending.gov and (2) USAID's implementation and use of the Government-wide financial data standards established by OMB and Treasury. USAID's management is responsible for reporting financial and award data in accordance with these standards, as applicable.

We conducted our performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). 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. Our performance audit involves performing procedures to obtain evidence about the FY 2020 Q4 financial and award data. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the FY 2020 Q4 financial and award data, whether due to fraud or error. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We concluded that USAID complied with the requirements of the DATA Act. We found that the FY 2020 Q4 financial and award data of USAID for the quarter ended September 30, 2020, is presented in accordance with OMB and Treasury published 59 data definition standards, as applicable, for DATA Act reporting in all material respects. We found that the data USAID submitted substantially complied with the requirements for completeness, accuracy, timeliness, and quality. However, to help strengthen USAID's internal controls over its DATA Act reporting, we made recommendations to improve the completeness, accuracy, and timeliness of data elements.

This report is for the purpose of concluding on the audit objectives described above. Accordingly, this report is not suitable for any other purpose.

This report is intended for the information and use of the USAID's management, OIG, and the U.S. Congress, and is made available to the public.

**United States Agency for International Development (USAID)
Independent Auditor’s Report on the Compliance with the
Digital Accountability and Transparency Act of 2014 Submission Requirements
for Fiscal Year 2021**

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**United States Agency for International Development (USAID)
Independent Auditor’s Report on the Compliance with the
Digital Accountability and Transparency Act of 2014 Submission Requirements
for Fiscal Year 2021**

I. Background***U.S. Agency for International Development***

The U.S. Agency for International Development (USAID) is an independent Federal Agency that receives overall foreign-policy guidance from the Secretary of State. With an official presence in 87 countries and programs in 32 others, the Agency accelerates human progress in developing countries by reducing poverty, advancing democracy, empowering women, building market economies, promoting security, responding to crises, and improving quality of life through investments in health and education. USAID is headed by an Administrator and Deputy Administrator, both appointed by the President and confirmed by the Senate. As the U.S. Government’s lead international development and humanitarian-assistance agency, USAID helps societies realize their full potential on their Journey to Self-Reliance.

In Washington, USAID’s regional, pillar, and central Bureaus coordinate the Agency’s activities and support the implementation of programs overseas. Independent Offices (IOs) support both crosscutting or more limited services. The regional Bureaus are Africa (AFR), Asia (ASIA), Middle East (ME), Latin America and the Caribbean (LAC), and Europe and Eurasia (E&E).

The Office of Inspector General (OIG) is independent and separate from the USAID Office of the Administrator. The OIG reviews the integrity of the Agency’s operations through audits, assessments, investigations, and inspections.

The DATA Act

The Digital Accountability and Transparency Act of 2014 (DATA Act) was enacted May 9, 2014, to expand the reporting requirements pursuant to Federal Funding Accountability and Transparency Act of 2006 (FFATA)¹. The DATA Act, in part, requires that Federal agencies report financial and payment data for publication on USASpending.gov in accordance with government-wide financial data standards established by the U.S. Treasury and the Office of Management and Budget. The DATA Act also requires the Office of Inspector General of each Federal agency to report on its agency’s DATA Act submission and compliance in the form of three reviews. Subsequently, and in accordance with the DATA Act, Treasury began displaying federal agencies’ data on USASpending.gov for taxpayers and policymakers in May 2017.

In April 2020, OMB issued M-20-21, *Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19)*, which made changes to DATA Act reporting. Since USAID received COVID-19 relief funds, we perform testing of COVID-19 relief funds data elements.

¹ Public Law 113-101 (May 9, 2014)

The USAID Office of Inspector General (OIG) contracted with Brown & Company CPAs and Management Consultants, PLLC (Brown & Company), an independent certified public accounting firm, to perform this audit assessment of the USAID's compliance under the DATA Act. The audit objective, scope, and methodology are presented in Appendix I.

II. Overall Audit Results

For the USAID FY 2021 DATA Act Audit, we selected and tested the FY 2020 Q4 data submission. Based on the results of our audit, we determined that data within our sample that USAID reported for FY 2020 Q4 for publication on USAspending.gov were substantially complete, accurate, timely, and of high quality. However, to help strengthen USAID's internal controls over its DATA Act reporting, we made recommendations to improve the completeness, accuracy, and timeliness of data elements.

We found that the USAID implemented and used the government-wide financial data standards as established by OMB and Treasury, as applicable. We found that required elements were presented in accordance with the standards.

Overall Determination of Quality

Based on the results of our statistical and non-statistical testing for the USAID's DATA Act audit for FY 2020 Q4, the USAID scored 93.96 points out of a 100, which is a quality rating of Higher. The FY 2021 USAID DATA Act Quality Scorecard is presented in Appendix II.

III. Statistical Results

Data Element Analysis

The Data Element Analysis results from our testing are presented below and listed in Appendix III FY 2021 USAID Computation of the Error Rates and Appendix IV FY 2021 USAID Data Element Analysis. The audit results are substantially consistent with the risks identified in the USAID's Data Quality Plan, except that USAID assessed validating timeliness as moderate risk, but our results assessed timeliness as high risk.

For comparison of FY 2021 data element error rates for accuracy to FY 2019 results, see Appendix V FY 2021 and FY 2019 USAID Comparative Results Table.

Completeness of the Data – Projected Error Rate

The projected error rate for the completeness of the data elements is 2.74%. Based on a 95% confidence level, the projected error rate for the completeness of the data elements is between 1.83% and 3.64%. A data element was considered complete if the required data element that should have been reported was reported. The auditor issued a "Notice of Finding and Recommendation" to address the completeness of the data.

Accuracy of the Data – Projected Error Rate

The projected error rate for the accuracy of the data elements is 5.34%. Based on a 95% confidence level, the projected error rate for the accuracy of the data elements is between 4.41% and 6.27%. A data element was considered accurate when amounts and other data relating to recorded transactions were recorded in accordance with the DAIMS, RSS, IDD, and the online data dictionary, and agree with the originating award documentation/contract file. The auditor issued a "Notice of Finding and Recommendation" to address the accuracy of the data.

Timeliness of the Data - Actual Error Rate

The projected error rate for the timeliness of the data elements is 12.02%. Based on a 95% confidence level, the projected error rate for the timeliness of the data elements is between 8.30% and 15.75%. The timeliness of data elements was based on the reporting schedules defined by the financial, procurement, and financial assistance requirements (FFATA, FAR, FPDS-NG, FABS, and DAIMS). USAID timeliness error rate is high due to the lack of internal control to ensure signed and dated contracts or procurement documents are readily available for inspection. The auditor issued a “Notice of Finding and Recommendation” to address the timeliness of the data.

IV. Data Standards

Implementation and Use of the Data Standards

We have evaluated the USAID’s implementation of the government-wide financial data standards for award and spending information and determined the USAID is using the standards as defined by OMB and Treasury.

The USAID linked by common identifiers (e.g., PIID, FAIN), all of the data elements in the USAID’s procurement, financial, and grants systems, as applicable. For the Treasury’s DATA Act Broker files tested, we generally found that the required elements were present in the file and that the record values were presented in accordance with the standards.

V. Non-Statistical Results

Completeness of the Agency DATA Act Submission

We evaluated the USAID’s DATA Act submission to Treasury’s DATA Act Broker and determined that the submission was complete. To be considered a complete submission, we evaluated Files A, B, and C to determine that all transactions and events that should have been recorded were recorded in the proper period.

Timeliness of the Agency DATA Act Submission

We evaluated the USAID’s FY 2020 4Q DATA Act submission to Treasury’s DATA Act Broker and determined that the submission was timely. To be considered timely, it had to be submitted and certified within 45 days of quarter end.

Completeness of Summary-Level Data for Files A and B

We performed summary-level data reconciliations and linkages for Files A and B and did not identify any variances. The test results verified: (1) summary-level data from File A matched the Agency’s GTAS SF-133; (2) the totals and TAS identified in File A matched File B; and (3) all object class codes from File B match codes defined in Section 83 of OMB Circular No. A-11.

Results of Linkages from File C to Files B, D1 and D2

We tested the linkages between File C to File B by TAS, object class, and program activity, the linkages between File C to File D1 by both the PIID and Parent Award ID and the linkages between File C to File D2 by the FAIN or URI. All of the TAS, object class, and program activity data elements from File C existed in File B and all of the PIIDs/Parent Award IDs/FAINs/URIs from File C existed in File D1/D2; and all PIIDs/Parent Award IDs/FAINs/URIs in Files D1/D2 existed in File C. We determined that File C was suitable for sample selection.

Analysis of the Accuracy of Dollar Value-related Data Elements

The following table displays the results of the accuracy of the data elements that are associated with a dollar value. The absolute value of errors by data element are not projected to the population.

Accuracy of Dollar-Value Related Data Elements

PIID/FAIN	Data Element	Accurate	Not Accurate	Not Applicable	Total Tested	Error Rate	Absolute Value of Errors
PIID	13 Federal Action Obligation	156	3	0	159	2%	\$ -
PIID	14 Current Total Value Award	139	20	0	159	13%	\$32,430,772.55
PIID	15 Potential Total Value Award	144	15	0	159	9%	\$ 9,826,776.34
PIID	53 Obligation	125	34	0	159	21%	\$ (2,711,925.42)
FAIN	11 Amount of Award	73	6	0	79	8%	\$ 7,015,714.00
FAIN	12 Non-Federal Funding Amount	74	5	0	79	6%	\$ 7,015,714.00
FAIN	13 Federal Action Obligation	78	1	0	79	1%	\$ -
FAIN	53 Obligation	78	1	0	79	1%	\$ -
	Total	867	85	0	952		

Analysis of Errors in Data Elements Not Attributable to the Agency

The following table displays the results for errors in data elements that were not attributable to USAID.

Errors in Data Elements not Attributable to the Agency

PIID/FAIN	Data Element	Data Element Description	Number of Exceptions	Attributed To
PIID	1	Awardee/Recipient Legal Entity Name	27	Based on SAM Input
PIID	2	Awardee/Recipient Unique Identifier	21	
PIID	3	The Ultimate Parent Unique Identified	24	Based on SAM Input
PIID	4	Ultimate Parent Legal Entity Name	30	Based on SAM Input
PIID	5	Legal Entity Address	65	Based on SAM Input. Legal entity address did not have the +4 required for the zip code.
PIID	6	Legal Entity Congressional District	104	FPDS, Based on CO Input
PIID	7	Legal Entity Country Code	20	SAM, Based on CO Input
PIID	8	Legal Entity Country Name	20	Based on SAM Input
FAIN	1	Awardee/Recipient Legal Entity Name	5	Based on SAM Input
FAIN	2	Awardee/Recipient Unique Identifier	5	Based on SAM Input
FAIN	3	The Ultimate Parent Unique Identified	6	Based on SAM Input
FAIN	4	Ultimate Parent Legal Entity Name	5	Based on SAM Input
FAIN	7	Legal Entity Country Code	6	Based on SAM Input
FAIN	8	Legal Entity Country Name	7	Based on SAM Input
FAIN	19	Catalog of Federal Domestic Assistance Number	5	Based on SAM Input
FAIN	20	Catalog of Federal Domestic Assistance Title	5	Based on SAM Input
FAIN	32	Primary Place of Performance Country Code	25	Based on SAM Input
FAIN	33	Primary Place of Performance Country Name	25	Based on SAM Input
		Total Exceptions	405	

File C COVID-19 Outlay Testing and Results

The Federal Government's response to the COVID-19 pandemic included an economic relief package and new reporting requirements for agencies that received COVID-19 funds. Effective for the June 2020 reporting period, agencies with COVID-19 relief funding must submit DATA Act Files A and B on a monthly basis.

We selected a non-statistical sample of 22 records out of 97 File C outlay records from the third month of the FY 2020 Q4 DATA Act submission. Our testing included assessing the Parent Award ID number, PIID/FAIN, object class, appropriations account, obligation, program activity, outlay, and DEFC File C outlays data elements for completeness, accuracy, and timeliness. Based on our testing, we found that the File C outlays for our sample of 22 records, were 100% complete, 100% accurate, and 100% timely. This

non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

VI. Other Report Content

Assessment of Internal Controls

The USAID's management is responsible for the compliance of the FY 2020 Q4 financial and award data submissions in accordance with the DATA Act and submission standards developed by the Treasury and the OMB.

We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit objectives. In particular, we assessed the internal control components (control environment, risk assessment, control activities, information and communication, and monitoring) and their related principles outlined in the GAO, Standards for Internal Controls in the Federal Government (Green Book) that we deemed significant. However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

We determined that the USAID internal and information system controls as it relates to the extraction of data from the source systems and the reporting of data to the DATA Act Broker have been properly designed and implemented and are operating effectively.

DATA Act Date Anomaly

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) identified a timing anomaly with the oversight requirements contained in the Digital Accountability and Transparency Act of 2014. That is, the first Inspector General (IG) reports were due to Congress in November 2016; however, Federal agencies were not required to report spending data until May 2017. To address this reporting date anomaly, the IGs provided Congress with their first required reports by November 8, 2017, 1-year after the statutory due date, with two subsequent reports to be submitted following on a 2-year cycle. This is the third and final report required under the DATA Act. On December 22, 2015, CIGIE's chair issued a letter detailing the strategy for dealing with the IG reporting date anomaly and communicated the strategy to the Senate Committee on Homeland Security and Governmental Affairs and the House Committee on Oversight and Government Reform.

Testing Limitations for Files E and F

File E of the DATA Act Information Model Schema contains additional awardee attribute information the Treasury DATA Act Broker software extracts from the System for Award Management (SAM). File F contains sub-award attribute information the broker software extracts from the FFATA Subaward Reporting System (FSRS). Files E and F data remain the responsibility of the awardee in accordance with terms and conditions of Federal agreements, and the quality of these data remains the legal responsibility of the recipient. Therefore, agency senior accountable officials (SAO) are not responsible for certifying the quality of File E and F data reported by awardees, but they are responsible for assuring controls are in place to verify that financial assistance awardees register in SAM at the time of the award. As such, we did not assess the completeness, accuracy, timeliness, and quality of the data extracted from SAM and FSRS via the Treasury broker software system.

VII. Notice of Finding and Recommendation

USAID DATA Act Notification of Finding and Recommendation

Finding 2021-1 USAID has Instances of Inaccurate, Incomplete and Untimely Data Elements

Criteria: *Digital Accountability and Transparency Act of 2014 Section 2 states the purposes of this Act are to (4) improve the quality of data submitted to USAspending.gov by holding Federal agencies accountable for the completeness and accuracy of the data submitted.*

Council of the Inspectors General on Integrity and Efficiency (CIGIE) Federal Audit Executive Council (FAEC), Inspectors General Guide to Compliance under the DATA Act December 4, 2020, defines Accuracy for the DATA Act as:

“Amounts and other data relating to reported transactions have been recorded in accordance with the DAIMS, Reporting Submission Specification (RSS), Interface Definition Document (IDD), and the online data dictionary, and agree with the original award documentation/contract file.”

Additionally, the guide states the following for the assessment of completeness, accuracy, and timeliness:

Completeness:

“Determine if the data element is required for the record selected. If required, determine if the data element is included in the appropriate files. If a required data element was not reported, it is incomplete.”

Accuracy:

“Data elements in File C should agree to the agency financial system and source documentation. Additionally, to assess accuracy of data elements in Files D1 and D2, use the crosswalk information provided in DAIMS.”

Timeliness:

“Procurement award data elements in File D1 are reported in FPDS-NG within 3 business days after the date that the contract award was signed (See FAR Section 4.604). Contracts awarded in emergency situations (FAR Part 18) or urgent and compelling situations (FAR Part 6) have 30 calendar days. Reported means the FPDS-NG Approved Date must be within 3 business days or 30 calendar days, as applicable, after the FPDS-NG Date Signed (File D1 Action Date) for the contract award.”

Condition: To assess the accuracy of the award-level transactions, we traced the data elements in Files C, D1 and D2 to USAID’s financial records and source documentation. Additionally, to assess the accuracy of the data elements in File D1 and D2, we used the “CIGIE DATA Act crosswalk” information.

Brown & Company selected and tested a statistical sample of 238 records from a population of 7,165 records. For accuracy of each of the required data elements that should have been reported, the data element was reported in the appropriate Files A through D2. We found PIID or FAIN exceptions for 196 of the 238 (82%) records selected for testing. The exceptions resulted 2,058 errors, consisting of 285 incomplete, 548 inaccurate, and 1,225 untimely. There were 405 exceptions (data elements number 1-8, 19-20, and 32-33) not attributable to USAID, but attributable to SAM and FPDS data.

Summary Results of PIID and FAIN Statistical Sample Testing

	Number Data Elements Incomplete	Number Data Elements Inaccurate	Number Data Elements Untimely
PIID	265	435	1,003
FAIN	20	113	222
Total Exceptions	285	548	1,225

Summary of the Highest Error Rates

DAIMS Element Number	Data Element Name	Accuracy*	Completeness*	Timeliness*
26	Period of Performance Start Date	26%	13%	22%
6	Legal Entity Congressional District	16%	12%	18%
25	Action Date	16%	5%	10%
31	Primary Place of Performance Congressional District	15%	10%	12%
30	Primary Place of Performance Address	13%	11%	13%
5	Legal Entity Address	11%	6%	13%
22	Award Description	11%	5%	14%

*For each data element, we divided the number of exceptions by the total sample count (238 samples) for the relevant files to obtain the percentage error rate for that data element.

Cause: For procurement award data, we noted exceptions for completeness due to missing information on the source documents. We noted exceptions for accuracy due to information on the source documents not aligning with the information reported in File D1. We also found exceptions with timeliness due to award documents not having signatures and or dates required to validate the action dates, or the action date was not entered in to GLAAS.

For financial assistance award data, we noted exceptions for completeness due missing information on the financial assistance award documents. We noted exceptions for accuracy due to the inconsistency of accurate information transferred from the source documents to File D2. For example, there were instances where the date the agreement was signed differed from the date in File D2. We also found exceptions with timeliness due to financial assistance award documents not having signatures and dates required to validate the action dates.

Effect: There is a risk that inaccurate, incomplete, and untimely data will be uploaded to USAspending.gov decreasing the reliability and usefulness of the data.

Recommendation 1:

We recommend USAID’s management improve procedures to ensure the USAID system data (Phoenix and GLAAS) for the DATA Act submission is consistent with supporting documents, as applicable.

Recommendation 2:

We recommend USAID’s management improve procedures to ensure that executed contracts and procurement documents are uploaded into ASIST and are available to validate timeliness of data elements.

VIII. Status of Prior Period Recommendations

There were no open recommendations from prior USAID DATA Act audit reports.

IX. Auditor's Response to Agency Comments

We provided our draft report to USAID on November 1, 2021, and on November 3, 2021, received Management's Response, which is included as Appendix VI. The audit report includes recommendations. USAID concurred with our recommendations. In general, USAID's management acknowledges that the USAspending.gov data submission included errors for completeness, accuracy, and timeliness. The errors were the results of specific data elements that were not supported, documents not provided to the auditor, or third-party entries.



Greenbelt, Maryland
November 4, 2021

Appendix I – Objective, Scope and Methodology

Objective

The objective of this performance audit was to assess the USAID compliance under the DATA Act with respect to:

- The completeness, accuracy, timeliness, and quality of FY 2020 Q4 financial and award data submitted to the Treasury for publication on USAspending.gov, and
- The USAID’s implementation and use of the Government-wide financial data standards established by the Office of Management and Budget (OMB) and Treasury.

Scope

The scope of this engagement is USAID’s FY 2020 Q4 financial and award data submitted for publication on USAspending.gov.

The scope includes examining DATA Act information reported in USAID’s FY 2020 Q4 financial and award data files listed below, as applicable:

- File A: Appropriations Account,
- File B: Object Class and Program Activity,
- File C: Award Financial,
- File D1: Award (Procurement)
- File D2: Award (Financial Assistance),
- File E: Additional Awardee Attributes, and
- File F: Sub-award Attributes

Files A, B, and C are submitted by the federal agency’s internal financial system(s). Files A and B are summary-level financial data. File C is reportable award-level data. Files D1 through F contain detailed demographic information for award-level records reported in File C. Files D1 through F are submitted by external award reporting systems to Treasury’s DATA Act Broker. The senior accountable official for USAID is required to certify these seven data files for its agency’s financial and award data to be published on USAspending.gov.

Methodology

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Our audit was performed in accordance with the relevant DATA Act guidance and policies issued by GAO, OMB, and CIGIE, including the CIGIE FAEC *Inspectors General Guide to Compliance under the DATA Act*, dated December 4, 2020. We conducted our fieldwork from February 10, 2021 through October 18, 2021.

To accomplish our objectives, we:

- obtained and documented our understanding of any regulatory criteria related to USAID’s responsibilities to report financial and award data under the DATA Act;
- assessed internal controls over financial reporting for the DATA Act;
- reviewed and reconciled the FY 2020 Q4 summary-level data submitted by USAID for publication on USAspending.gov;

- assessed USAID’s implementation and use of the 59 data elements/standards established by OMB and Treasury; and
- assessed the completeness, accuracy, timeliness, and quality of the financial and award data sampled; this included testing USAID’s submission of Files A through D2.

To test USAID’s DATA Act submission of Files A through D2, we:

- reviewed USAID’s certification and submission process;
- determined the timeliness of USAID’s submission;
- determined completeness of summary level data for Files A and B;
- determined whether File C is complete and suitable for sampling;
- selected and examined the statistical sample of 238 valid records from 7,165 PIID and FAINs records reported in USAID’s FY 2020 Q4 certified spending data reported in File C;
- selected and examined the non-statistical sample of 22 of 97 COVID-19 outlays records in USAID’s FY 2020 Q4 certified spending data reported in File C;
- tested detailed record-level linkages for Files C and D1 and D2;
- tested detailed record-level data elements for Files C and D1 and D2 for completeness, accuracy, timeliness, and quality; and analyzed results.

For each of the required 45 data elements that should have been reported for PIID and FAINs records, the data element was reported in the appropriate Files A through D2, with some exceptions for completeness, accuracy and timeliness as reported in Appendix II FY 2021 USAID DATA Act Quality Scorecard and Appendix III FY 2021 USAID Computation of the Error Rates.

For the COVID-19 relief funds, we identified, assessed, and documented controls implemented to ensure specific DATA Act reporting requirements related to these funds are being met as prescribed by OMB M-20-21. We tested outlays for COVID-19 awards in File C. For FY 2021, new COVID-19 DATA Act elements (National Interest Action Code P20C (File D1 and Disaster Emergency Fund Code (File B, C) were tested. For each of the required data elements that should have been report for the COVID19 records, all data elements were reported in the appropriate Files A through D2.

In assessing USAID’s controls, we:

- considered the USAID’s risk profile, and documented whether the USAID identified any risks associated with the controls over the DATA Act source systems and reporting;
- obtained and documented our understanding of the design of internal and information system controls as they relate to the extraction of data from the source systems and the reporting of data to the DATA Act Broker.
- determined and documented whether the SAO or designee has provided monthly or quarterly assurance (as applicable) that its agency’s internal controls support the reliability and validity of the agency’s summary-level and record-level data reported for publication on USAspending.gov.
- assessed and documented whether internal and information system controls as they relate to the extraction of data from the source systems and the reporting of data to the DATA Act Broker have been properly designed and implemented, and are operating effectively to allow the audit team to assess audit risk and design audit procedures.

The following internal control components and related principles² were deemed significant to our audit objectives:

1. Control Environment

Principles: 1) demonstrate a commitment to integrity and ethical values. 2) oversee the entity's control system. 3) establish an organization structure, assign responsibility, and delegate authority to achieve the entity's objectives. 4) demonstrate a commitment to recruit, develop, and retain competent individuals. 5) evaluate performance and hold individuals accountable for their internal control responsibilities.

2. Risk Assessment

Principles: 6) define objectives clearly to enable the identification of risks and define risk tolerances. 7) identify, analyze, and respond to risks related to achieving the defined objectives. 8) consider the potential for fraud when identifying, analyzing, and responding to risks. 9) identify, analyze, and respond to significant changes that could impact the internal control system.

3. Control Activities

Principles: 10) design control activities to achieve objectives and respond to risks. 11) design the entity's information system and related control activities to achieve objectives and respond to risks. 12) implement control activities through policies.

4. Information and Communication

Principles: 13) use quality information to achieve the entity's objectives. 14) internally communicate the necessary quality information to achieve the entity's objectives. 15) externally communicate the necessary quality information to achieve the entity's objectives.

5. Monitoring

Principles: 16) establish and operate monitoring activities to monitor the internal control system and evaluate the results. 17) remediate identified internal control deficiencies on a timely basis.

² GAO-14-704G, Standards for Internal Control in the Federal Government (September 10, 2014)

Appendix II – FY 2021 USAID DATA Act Quality Scorecard

USAID’s quality of data is defined as data that is complete, accurate, and timely, and includes statistical and non-statistical testing results. The quality scorecard calculates the quality based on weighted scores of both statistical sampling results and non-statistical testing results. For the quality scorecard, statistical testing results are valued at 60 points and non-statistical testing results are valued at 40 points, for a total of 100 points. We combined the results of the statistical sample with the results on the non-statistical testing in the below quality scorecard. The overall quality score is Higher at 93.96%.

United States Agency for International Development			Maximum Points Possible				
FY 2021 DATA Act Quality Scorecard			Without Outlays (No COVID-19 Funding)	With Outlays (COVID-19 Funding)			
	Criteria	Score			Quality Level		
Non-Statistical	Timeliness of Agency Submission	5.0	5.0	5.0			
	Completeness of Summary Level Data (Files A & B)	7.8	13.0	10.0			
	Suitability of File C for Sample Selection	10.0	13.0	10.0			
	Record-Level Linkages (Files C & D1/D2)	7.0	9.0	7.0			
	COVID-19 Outlay Testing Non-Statistical Sample	8.0	0.0	8.0			
Statistical	Completeness	14.6	15.0	15.0	0.0	69.9	Lower
	Accuracy	28.4	30.0	30.0	70.0	84.9	Moderate
	Timeliness	13.2	15.0	15.0	85.0	94.9	Higher
Quality Score	Higher	93.96	100.0	100.0	95.0	100	Excellent

Appendix III – FY 2021 USAID Computation of the Error Rates

The following tables (Table 1 - Results of PIID and FAIN Statistical Samples Testing and Table 2 - Results of COVID-19 Outlay Non-Statistical Sample Testing) display the results for errors in data elements by sample record for completeness, accuracy, and timeliness. For each sample record, we tested the applicable data elements, documented the number of errors and computed the error rates (number of errors divided by total number of data elements). We computed the PIID and FAIN total errors and the average error rates as 2.74% incomplete, 5.43% inaccurate, and 12.02% untimely. We computed the COVID-19 total errors and the average error rates as 0% incomplete, 0% inaccurate, and 0% untimely.

Table 1 - Results of PIID and FAIN Statistical Sample Testing

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
1	43	1	2.33%	1	2.33%	1	2.33%
2	44	0	0.00%	3	6.82%	0	0.00%
3	44	2	4.55%	3	6.82%	2	4.55%
4	46	1	2.17%	3	6.52%	4	8.70%
5	46	1	2.17%	3	6.52%	1	2.17%
6	44	1	2.27%	2	4.55%	1	2.27%
7	46	2	4.35%	7	15.22%	2	4.35%
8	44	4	9.09%	4	9.09%	4	9.09%
9	44	0	0.00%	1	2.27%	0	0.00%
10	45	1	2.22%	5	11.11%	45	100.00%
11	46	3	6.52%	3	6.52%	3	6.52%
12	44	4	9.09%	5	11.36%	5	11.36%
13	42	5	11.90%	5	11.90%	42	100.00%
14	44	0	0.00%	1	2.27%	0	0.00%
15	42	0	0.00%	4	9.52%	0	0.00%
16	42	0	0.00%	2	4.76%	0	0.00%
17	42	0	0.00%	5	11.90%	0	0.00%
18	44	1	2.27%	4	9.09%	1	2.27%
19	42	2	4.76%	3	7.14%	2	4.76%
20	42	0	0.00%	0	0.00%	0	0.00%
21	42	1	2.38%	1	2.38%	1	2.38%
22	39	3	7.69%	3	7.69%	3	7.69%
23	42	1	2.38%	1	2.38%	1	2.38%
24	43	0	0.00%	0	0.00%	0	0.00%
25	42	3	7.14%	3	7.14%	42	100.00%
26	43	6	13.95%	8	18.60%	6	13.95%
27	42	0	0.00%	0	0.00%	0	0.00%
28	42	4	9.52%	4	9.52%	4	9.52%
29	42	2	4.76%	3	7.14%	42	100.00%
30	41	1	2.44%	2	4.88%	1	2.44%

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
		Count	Percentage	Count	Percentage	Count	Percentage
31	40	1	2.50%	3	7.50%	2	5.00%
32	40	1	2.50%	2	5.00%	1	2.50%
33	40	0	0.00%	3	7.50%	0	0.00%
34	42	1	2.38%	1	2.38%	0	0.00%
35	42	2	4.76%	3	7.14%	2	4.76%
36	40	0	0.00%	1	2.50%	0	0.00%
37	42	0	0.00%	1	2.38%	0	0.00%
38	39	0	0.00%	1	2.56%	0	0.00%
39	42	4	9.52%	3	7.14%	42	100.00%
40	42	1	2.38%	1	2.38%	1	2.38%
41	44	0	0.00%	1	2.27%	0	0.00%
42	42	0	0.00%	0	0.00%	0	0.00%
43	43	0	0.00%	3	6.98%	0	0.00%
44	43	0	0.00%	2	4.65%	0	0.00%
45	43	0	0.00%	2	4.65%	0	0.00%
46	43	0	0.00%	1	2.33%	0	0.00%
47	43	2	4.65%	5	11.63%	2	4.65%
48	43	2	4.65%	5	11.63%	2	4.65%
49	43	0	0.00%	2	4.65%	2	4.65%
50	43	0	0.00%	3	6.98%	0	0.00%
51	42	0	0.00%	3	7.14%	0	0.00%
52	43	0	0.00%	3	6.98%	0	0.00%
53	43	0	0.00%	1	2.33%	0	0.00%
54	43	0	0.00%	0	0.00%	0	0.00%
55	43	1	2.33%	3	6.98%	1	2.33%
56	43	1	2.33%	5	11.63%	1	2.33%
57	44	0	0.00%	1	2.27%	0	0.00%
58	43	0	0.00%	3	6.98%	0	0.00%
59	41	0	0.00%	2	4.88%	0	0.00%
60	43	3	6.98%	5	11.63%	3	6.98%
61	41	1	2.44%	1	2.44%	1	2.44%
62	43	2	4.65%	3	6.98%	2	4.65%
63	42	1	2.38%	2	4.76%	3	7.14%
64	42	0	0.00%	2	4.76%	0	0.00%
65	36	0	0.00%	0	0.00%	0	0.00%
66	36	1	2.78%	3	8.33%	36	100.00%
67	43	0	0.00%	0	0.00%	0	0.00%
68	42	0	0.00%	4	9.52%	42	100.00%
69	43	0	0.00%	3	6.98%	0	0.00%
70	42	2	4.76%	3	7.14%	2	4.76%

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
71	42	2	4.76%	3	7.14%	3	7.14%
72	42	2	4.76%	3	7.14%	2	4.76%
73	42	2	4.76%	3	7.14%	2	4.76%
74	44	2	4.55%	2	4.55%	2	4.55%
75	40	1	2.50%	1	2.50%	1	2.50%
76	43	4	9.30%	5	11.63%	4	9.30%
77	37	0	0.00%	0	0.00%	0	0.00%
78	38	0	0.00%	1	2.63%	0	0.00%
79	36	0	0.00%	1	2.78%	1	2.78%
80	39	0	0.00%	1	2.56%	0	0.00%
81	42	1	2.38%	1	2.38%	2	4.76%
82	42	3	7.14%	3	7.14%	3	7.14%
83	43	2	4.65%	2	4.65%	2	4.65%
84	43	4	9.30%	4	9.30%	43	100.00%
85	43	3	6.98%	4	9.30%	3	6.98%
86	43	2	4.65%	2	4.65%	3	6.98%
87	42	4	9.52%	4	9.52%	4	9.52%
88	42	7	16.67%	7	16.67%	7	16.67%
89	42	3	7.14%	4	9.52%	42	100.00%
90	42	3	7.14%	4	9.52%	42	100.00%
91	45	5	11.11%	5	11.11%	5	11.11%
92	43	4	9.30%	6	13.95%	4	9.30%
93	42	2	4.76%	4	9.52%	2	4.76%
94	42	3	7.14%	3	7.14%	3	7.14%
95	42	1	2.38%	2	4.76%	0	0.00%
96	45	3	6.67%	4	8.89%	3	6.67%
97	43	0	0.00%	1	2.33%	0	0.00%
98	44	1	2.27%	1	2.27%	1	2.27%
99	42	1	2.38%	2	4.76%	1	2.38%
100	42	2	4.76%	2	4.76%	2	4.76%
101	42	1	2.38%	1	2.38%	1	2.38%
102	42	1	2.38%	1	2.38%	1	2.38%
103	42	0	0.00%	2	4.76%	42	100.00%
104	44	7	15.91%	10	22.73%	7	15.91%
105	42	0	0.00%	3	7.14%	0	0.00%
106	44	1	2.27%	1	2.27%	1	2.27%
107	44	0	0.00%	1	2.27%	0	0.00%
108	44	1	2.27%	1	2.27%	1	2.27%
109	44	0	0.00%	2	4.55%	1	2.27%
110	44	1	2.27%	2	4.55%	1	2.27%

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
111	44	2	4.55%	2	4.55%	2	4.55%
112	44	1	2.27%	1	2.27%	1	2.27%
113	41	0	0.00%	2	4.88%	0	0.00%
114	42	3	7.14%	6	14.29%	3	7.14%
115	44	2	4.55%	2	4.55%	2	4.55%
116	44	2	4.55%	2	4.55%	2	4.55%
117	43	1	2.33%	1	2.33%	1	2.33%
118	42	0	0.00%	0	0.00%	0	0.00%
119	43	3	6.98%	3	6.98%	3	6.98%
120	43	3	6.98%	3	6.98%	3	6.98%
121	43	1	2.33%	1	2.33%	1	2.33%
122	44	2	4.55%	3	6.82%	2	4.55%
123	44	2	4.55%	3	6.82%	2	4.55%
124	43	7	16.28%	9	20.93%	43	100.00%
125	46	1	2.17%	1	2.17%	1	2.17%
126	46	2	4.35%	2	4.35%	46	100.00%
127	46	1	2.17%	1	2.17%	46	100.00%
128	45	0	0.00%	0	0.00%	0	0.00%
129	46	0	0.00%	0	0.00%	0	0.00%
130	44	0	0.00%	0	0.00%	0	0.00%
131	44	1	2.27%	1	2.27%	44	100.00%
132	41	2	4.88%	2	4.88%	2	4.88%
133	42	1	2.38%	1	2.38%	1	2.38%
134	42	0	0.00%	0	0.00%	1	2.38%
135	42	0	0.00%	0	0.00%	0	0.00%
136	42	1	2.38%	1	2.38%	1	2.38%
137	42	3	7.14%	3	7.14%	3	7.14%
138	41	1	2.44%	2	4.88%	41	100.00%
139	44	4	9.09%	6	13.64%	44	100.00%
140	44	0	0.00%	0	0.00%	0	0.00%
141	44	2	4.55%	2	4.55%	2	4.55%
142	48	48	100.00%	48	100.00%	48	100.00%
143	46	3	6.52%	3	6.52%	46	100.00%
144	44	0	0.00%	0	0.00%	0	0.00%
145	44	5	11.36%	5	11.36%	5	11.36%
146	44	0	0.00%	2	4.55%	0	0.00%
147	46	3	6.52%	3	6.52%	3	6.52%
148	46	4	8.70%	4	8.70%	4	8.70%
149	44	0	0.00%	4	9.09%	0	0.00%
150	44	0	0.00%	0	0.00%	0	0.00%

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
151	46	0	0.00%	1	2.17%	0	0.00%
152	46	0	0.00%	1	2.17%	0	0.00%
153	46	0	0.00%	4	8.70%	0	0.00%
154	46	0	0.00%	2	4.35%	0	0.00%
155	42	0	0.00%	1	2.38%	0	0.00%
156	44	0	0.00%	2	4.55%	0	0.00%
157	44	0	0.00%	2	4.55%	0	0.00%
158	44	0	0.00%	2	4.55%	0	0.00%
159	42	0	0.00%	3	7.14%	0	0.00%
160	45	4	8.89%	4	8.89%	4	8.89%
161	43	0	0.00%	5	11.63%	43	100.00%
162	43	0	0.00%	4	9.30%	1	2.33%
163	43	0	0.00%	2	4.65%	0	0.00%
164	41	0	0.00%	3	7.32%	41	100.00%
165	43	0	0.00%	3	6.98%	43	100.00%
166	43	0	0.00%	2	4.65%	0	0.00%
167	43	0	0.00%	0	0.00%	0	0.00%
168	41	0	0.00%	1	2.44%	0	0.00%
169	40	0	0.00%	1	2.50%	0	0.00%
170	43	0	0.00%	0	0.00%	0	0.00%
171	43	0	0.00%	0	0.00%	0	0.00%
172	43	0	0.00%	0	0.00%	0	0.00%
173	43	0	0.00%	3	6.98%	0	0.00%
174	42	0	0.00%	1	2.38%	0	0.00%
175	40	0	0.00%	2	5.00%	0	0.00%
176	40	0	0.00%	1	2.50%	0	0.00%
177	40	0	0.00%	3	7.50%	0	0.00%
178	41	6	14.63%	6	14.63%	0	0.00%
179	41	0	0.00%	2	4.88%	0	0.00%
180	43	0	0.00%	0	0.00%	0	0.00%
181	41	0	0.00%	1	2.44%	40	97.56%
182	40	0	0.00%	1	2.50%	0	0.00%
183	40	0	0.00%	0	0.00%	0	0.00%
184	41	0	0.00%	1	2.44%	0	0.00%
185	42	0	0.00%	0	0.00%	0	0.00%
186	40	0	0.00%	1	2.50%	40	100.00%
187	43	0	0.00%	2	4.65%	0	0.00%
188	43	0	0.00%	0	0.00%	0	0.00%
189	41	0	0.00%	1	2.44%	0	0.00%
190	41	0	0.00%	0	0.00%	0	0.00%

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
191	43	0	0.00%	4	9.30%	0	0.00%
192	43	0	0.00%	0	0.00%	0	0.00%
193	43	0	0.00%	3	6.98%	0	0.00%
194	40	0	0.00%	0	0.00%	0	0.00%
195	40	0	0.00%	1	2.50%	0	0.00%
196	43	0	0.00%	1	2.33%	0	0.00%
197	43	0	0.00%	0	0.00%	0	0.00%
198	40	0	0.00%	1	2.50%	0	0.00%
199	43	0	0.00%	1	2.33%	0	0.00%
200	40	0	0.00%	1	2.50%	0	0.00%
201	43	0	0.00%	1	2.33%	0	0.00%
202	43	0	0.00%	1	2.33%	0	0.00%
203	43	0	0.00%	0	0.00%	0	0.00%
204	43	0	0.00%	0	0.00%	0	0.00%
205	41	0	0.00%	3	7.32%	0	0.00%
206	40	0	0.00%	4	10.00%	0	0.00%
207	42	0	0.00%	0	0.00%	0	0.00%
208	40	0	0.00%	0	0.00%	0	0.00%
209	42	0	0.00%	1	2.38%	0	0.00%
210	42	0	0.00%	1	2.38%	0	0.00%
211	45	3	6.67%	5	11.11%	3	6.67%
212	43	2	4.65%	2	4.65%	2	4.65%
213	43	0	0.00%	0	0.00%	0	0.00%
214	42	0	0.00%	1	2.38%	0	0.00%
215	43	0	0.00%	3	6.98%	0	0.00%
216	43	1	2.33%	1	2.33%	1	2.33%
217	43	0	0.00%	2	4.65%	0	0.00%
218	43	1	2.33%	1	2.33%	1	2.33%
219	43	1	2.33%	1	2.33%	1	2.33%
220	40	0	0.00%	0	0.00%	0	0.00%
221	40	0	0.00%	0	0.00%	0	0.00%
222	43	0	0.00%	0	0.00%	0	0.00%
223	40	0	0.00%	2	5.00%	0	0.00%
224	41	0	0.00%	1	2.44%	0	0.00%
225	42	0	0.00%	0	0.00%	0	0.00%
226	34	0	0.00%	0	0.00%	0	0.00%
227	36	0	0.00%	5	13.89%	0	0.00%
228	43	0	0.00%	4	9.30%	0	0.00%
229	43	1	2.33%	1	2.33%	1	2.33%
230	43	0	0.00%	0	0.00%	0	0.00%

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
231	40	0	0.00%	0	0.00%	0	0.00%
232	43	0	0.00%	0	0.00%	0	0.00%
233	42	0	0.00%	3	7.14%	0	0.00%
234	42	1	2.38%	2	4.76%	1	2.38%
235	43	0	0.00%	2	4.65%	0	0.00%
236	40	0	0.00%	2	5.00%	0	0.00%
237	41	0	0.00%	2	4.88%	0	0.00%
238	42	0	0.00%	0	0.00%	0	0.00%
Total Errors		285		548		1225	
Error Rate		2.74%		5.34%		12.02%	

Table 2 - Results of COVID-19 Outlay Non-Statistical Sample Testing

Sample Record Number	Total Number DEs	Number Incomplete		Number Inaccurate		Number Untimely	
1	6	0	0.00%	0	0.00%		0
2	7	0	0.00%	0	0.00%	0	0.00%
3	7	0	0.00%	0	0.00%	0	0.00%
4	6	0	0.00%	0	0.00%	0	0.00%
5	6	0	0.00%	0	0.00%	0	0.00%
6	6	0	0.00%	0	0.00%	0	0.00%
7	6	0	0.00%	0	0.00%	0	0.00%
8	6	0	0.00%	0	0.00%	0	0.00%
9	6	0	0.00%	0	0.00%	0	0.00%
10	7	0	0.00%	0	0.00%	0	0.00%
11	6	0	0.00%	0	0.00%	0	0.00%
12	6	0	0.00%	0	0.00%	0	0.00%
13	6	0	0.00%	0	0.00%	0	0.00%
14	6	0	0.00%	0	0.00%	0	0.00%
15	6	0	0.00%	0	0.00%	0	0.00%
16	6	0	0.00%	0	0.00%	0	0.00%
17	6	0	0.00%	0	0.00%	0	0.00%
18	6	0	0.00%	0	0.00%	0	0.00%
19	6	0	0.00%	0	0.00%	0	0.00%
20	6	0	0.00%	0	0.00%	0	0.00%
21	6	0	0.00%	0	0.00%	0	0.00%
22	7	0	0.00%	0	0.00%	0	0.00%
Total Errors		0		0		0	
Error Rate		0.00%		0.00%		0.00%	

Appendix IV – FY 2021 USAID Data Element Analysis

This FY 2021 USAID Data Element Analysis depicts our test results and the associated error rates by data element, as applicable, for the 238 sampled transactional testing for File D, which consisted of Files D1 and D2. These results do not include the 22 COVID-19 sampled transactional testing. The analysis includes the results for completeness, accuracy and timeliness in descending order by accuracy error rate percentage (non-projected)³.

DAIMS Element Number	Data Element Name	Accuracy	Completeness	Timeliness
26	Period of Performance Start Date	26%	13%	22%
6	Legal Entity Congressional District	16%	12%	18%
25	Action Date	16%	5%	10%
31	Primary Place of Performance Congressional District	15%	10%	12%
30	Primary Place of Performance Address	13%	11%	13%
5	Legal Entity Address	11%	6%	13%
22	Award Description	11%	5%	14%
37	Business Types	10%	1%	3%
17	NAICS Code	9%	0.42%	9%
32	Primary Place of Performance Country Code	9%	3%	13%
33	Primary Place of Performance Country Name	9%	3%	13%
14	Current Total Value of Award	8%	7%	14%
18	NAICS Description	8%	0.42%	9%
53	Obligation	7%	5%	15%
15	Potential Total Value of Award	6%	6%	13%
28	Period of Performance Potential End Date	6%	5%	12%
43	Funding Office Code	5%	2%	11%
42	Funding Office Name	5%	2%	11%
4	Ultimate Parent Legal Entity Name	4%	1%	9%
27	Period of Performance Current End Date	4%	3%	13%
1	Awardee/Recipient Legal Entity Name	3%	0.42%	11%
49	Awarding Office Code	3%	1%	11%
11	Federal Action Obligation	3%	0%	2%
48	Awarding Office Name	3%	1%	11%
12	Non-Federal Funding Amount	2%	0%	2%

³ For each data element, we divided the number of exceptions by the total sample count (238 samples) for the relevant files to obtain the percentage error rate for that data element.

DAIMS Element Number	Data Element Name	Accuracy	Completeness	Timeliness
13	Amount of Award	2%	1%	11%
3	Ultimate Parent Unique Identifier	2%	1%	10%
56	Program Activity	2%	1%	10%
2	Awardee/Recipient Unique Identifier	1%	0.42%	10%
8	Legal Entity Country Name	1%	0%	10%
16	Award Type	1%	0.84%	11%
50	Object Class	1%	1%	11%
7	Legal Entity Country Code	1%	0.42%	10%
38	Funding Agency Name	1%	1%	10%
39	Funding Agency Code	1%	1%	10%
40	Funding Sub Tier Agency Name	1%	1%	10%
41	Funding Sub Tier Agency Code	1%	1%	10%
23	Award Modification / Amendment Number	0%	1%	10%
24	Parent Award ID Number	0%	0.42%	2%
29	Ordering Period End Date	0%	0.42%	0%
34	Award ID Number (PIID/FAIN)	0%	0.42%	10%
36	Action Type	0%	0.42%	9%
44	Awarding Agency Name	0%	0.42%	10%
45	Awarding Agency Code	0%	0.42%	10%
46	Awarding Sub Tier Agency Name	0%	0.42%	10%
47	Awarding Sub Tier Agency Code	0%	0.42%	10%
51	Appropriations Account	0%	0.42%	10%
163	National Interest Action	0%	0.42%	0%
430	Disaster Emergency Fund Code	0%	0.42%	10%
19	Catalog of Federal Domestic Assistance (CFDA) Number	0%	0.00%	2%
20	Catalog of Federal Domestic Assistance (CFDA) Title	0%	0.00%	2%
35	Record Type	0%	0.00%	2%
54	Unobligated Balance	0%	0.00%	0%
57	Outlay (Gross Outlay Amount By Award CPE	0%	0.00%	0%

Appendix V – FY 2021 and FY 2019 USAID Comparative Results Table

This table below identifies the error rate by data element from the FY 2021 and FY 2019 audit results for the quarters tested. The information is being provided for illustrative purposes only and may not necessarily be indicative of actual percent change based on differences in testing procedures such as population size, sample methodology, quarter tested, file tested, and changes to data definition standards.

USAID Comparative Results for Data Elements Based on Accuracy Error Rates in Descending Order⁴

DAIMS Element Number	Data Element Name	Accuracy 2021 Error Rate	Accuracy 2019 Error Rate	% Change
26	Period of Performance Start Date	26%	46%	-20%
6	Legal Entity Congressional District	16%	5%	11%
25	Action Date	16%	16%	0%
31	Primary Place of Performance Congressional District	15%	3%	12%
30	Primary Place of Performance Address	13%	2%	11%
5	Legal Entity Address	11%	12%	-1%
22	Award Description	11%	8%	3%
37	Business Types	10%	2%	8%
17	NAICS Code	9%	39%	-30%
32	Primary Place of Performance Country Code	9%	6%	3%
33	Primary Place of Performance Country Name	9%	4%	5%
14	Current Total Value of Award	8%	11%	-3%
18	NAICS Description	8%	36%	-28%
53	Obligation	7%	64%	-57%
15	Potential Total Value of Award	6%	15%	-9%
28	Period of Performance Potential End Date	6%	41%	-35%
43	Funding Office Code	5%	1%	4%
42	Funding Office Name	5%	1%	4%
4	Ultimate Parent Legal Entity Name	4%	4%	0%
27	Period of Performance Current End Date	4%	34%	-30%
1	Awardee/Recipient Legal Entity Name	3%	4%	-1%
49	Awarding Office Code	3%	18%	-15%
11	Federal Action Obligation	3%	4%	-1%
48	Awarding Office Name	3%	4%	-1%

⁴ For each Fiscal Year and data element, we divided the number of exceptions by the total sample count (238) for the relevant files to obtain the percentage error rate for that data element.

DAIMS Element Number	Data Element Name	Accuracy 2021 Error Rate	Accuracy 2019 Error Rate	% Change
12	Non-Federal Funding Amount	2%	0%	2%
13	Amount of Award	2%	0%	2%
3	Ultimate Parent Unique Identifier	2%	3%	-1%
56	Program Activity	2%	0%	2%
2	Awardee/Recipient Unique Identifier	1%	4%	-3%
8	Legal Entity Country Name	1%	5%	-4%
16	Award Type	1%	19%	-18%
50	Object Class	1%	0%	1%
7	Legal Entity Country Code	1%	5%	-4%
38	Funding Agency Name	1%	2%	-1%
39	Funding Agency Code	1%	16%	-15%
40	Funding Sub Tier Agency Name	1%	2%	-1%
41	Funding Sub Tier Agency Code	1%	3%	-2%
23	Award Modification / Amendment Number	0%	2%	-2%
24	Parent Award ID Number	0%	6%	-6%
29	Ordering Period End Date	0%	5%	-5%
34	Award ID Number (PIID/FAIN)	0%	3%	-3%
36	Action Type	0%	8%	-8%
44	Awarding Agency Name	0%	1%	-1%
45	Awarding Agency Code	0%	1%	-1%
46	Awarding Sub Tier Agency Name	0%	1%	-1%
47	Awarding Sub Tier Agency Code	0%	1%	-1%
51	Appropriations Account	0%	0%	0%
163	National Interest Action	0%	0%	0%
430	Disaster Emergency Fund Code	0%	0%	0%
19	Catalog of Federal Domestic Assistance (CFDA) Number	0%	2%	-2%
20	Catalog of Federal Domestic Assistance (CFDA) Title	0%	2%	-2%
35	Record Type	0%	2%	-2%
54	Unobligated Balance	0%	0%	0%
57	Outlay (Gross Outlay Amount By Award CPE)	0%	0%	0%

Appendix VI – Management’s Response



MEMORANDUM

TO: Alvin Brown, Deputy Assistant Inspector General for Audit

FROM: Reginald W. Mitchell, Chief Financial Officer Reginald W. Mitchell Digitally signed by Reginald W. Mitchell
Date: 2021.11.03 10:04:23 -0400

DATE: November 3, 2021

SUBJECT: Management Comments to Respond to the Draft Audit Report Produced by the Office of Inspector General (OIG) titled, *Audit of the USAID Compliance with the Digital Accountability and Transparency Act of 2014 in the Fiscal Year 2021* (Task No. 00100921)

The U.S. Agency for International Development (USAID) would like to thank the Office of Inspector General (OIG) for the opportunity to provide comments on the subject draft report. The Agency agrees with the recommendation(s) and reports on the significant progress already made.

COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID) ON THE REPORT RELEASED BY THE USAID OFFICE OF THE INSPECTOR GENERAL (OIG) TITLED, *Audit of the USAID Compliance with the Digital Accountability and Transparency Act of 2014 in the Fiscal Year 2021* (Task No. 00100921)

Please find below the management comments from the U.S. Agency for International Development (USAID) on the draft report produced by the Office of the USAID Inspector General (OIG), which contains two recommendation(s) for USAID:

Recommendation 1: We recommend USAID’s management improve procedures to ensure the USAID system data (Phoenix and GLAAS) for the DATA Act submission is consistent with supporting documents, as applicable.

- **Management Comments:** USAID agrees with this recommendation. USAID has policies and processes in place to ensure the quality of data entered into the GLAAS and Phoenix corporate systems. In response to the OIG’s 2019 DATA Act audit USAID adopted additional data quality measures, including: outreach to users stressing the

importance of entering accurate data in USAID’s corporate systems; a quarterly Independent Verification and Validation (IV&V) process to assess and evaluate performance in loading complete and accurate data into ASIST; and an online dashboard to help M/OAA monitor the results of that IV&V effort. These ongoing efforts to improve GLAAS and Phoenix data quality resulted in a reduction of the “Accuracy Error Rate” from 8.8% in 2019 to 4.2% in 2021.

In addition, the 2021 “Accuracy Error Rate” includes inaccuracies in data elements provided by third parties (e.g. SAM and FPDS-NG). There is no evidence that USAID is providing inaccurate data in these cases, and USAID has no control over the data accuracy from external systems. If these third-party elements are removed, USAID’s Accuracy Error Rate would drop to 2.9%, which would qualify the Agency for the “Excellent” quality rating by CIGIE standards.

The audit also flagged data elements as “inaccurate” if a data element could not be found on the documentation for the specific modification stored in ASIST. However:

- B&C only reviewed documentation for the specific modifications pulled in their samples. A data element may be missing from a given modification, but present in the overall award history stored in ASIST. In these cases USAID was flagged as having an “accuracy error” when in fact the data element may have been present in ASIST.
- ASIST cross references to GLAAS for DATA Act data elements; this ensures that the data is captured in one part of our procurement systems while making it clear in the ASIST file where to find such elements. For example, for FPDS reports, ASIST cross references to GLAAS.

Both of these methodological choices risk overstating the true Accuracy Error Rate.

USAID will continue to focus on communicating and implementing existing data quality policies and processes with Phoenix and GLAAS that have, to date, been successful in reducing its Accuracy Error rate in half.

- **Target Completion Date:** 8/31/2022

Recommendation 2: We recommend USAID’s management improve procedures to ensure that executed contracts and procurement documents are uploaded into ASIST and are available to validate timeliness of data elements.

- **Management Comments:** USAID agrees with the recommendation. USAID has implemented policies and system enhancements to ensure contracts and procurement critical documents are uploaded into ASIST prior to obligation in GLAAS. Further, the Evaluation Division conducts reviews of the files in ASIST and will communicate to the

CO if there is a missing executed contract or procurement document. Most importantly, to address the timeliness of the data elements, the Agency implemented a quarterly Independent Verification and Validation (IV&V) process, which includes validating whether a fully executed procurement document was uploaded into ASIST; and an online dashboard to help M/OAA monitor the results of that IV&V effort.

Further, we are working on enhancements using eSign which automatically files the fully executed procurement documents in ASIST. This full deployment is targeted by the end of December this year.

The Agency will continue to monitor compliance with the requirement to upload executed contracts and procurement documents into ASIST and will assess the impact of eSign on this requirement after the functionality has been implemented.

- **Target Completion Date:** 6/30/2022

In view of the above, we request that the OIG inform USAID when it agrees or disagrees with a management comment.

Appendix VII – Glossary of Abbreviations and Acronyms

CIGIE	The Council of the Inspectors General on Integrity and Efficiency
CLM	Contract Lifecycle Management
COVID-19	Coronavirus Disease 2019
DAIMS	DATA Act Information Model Schema
DATA Act	The Digital Accountability and Transparency Act of 2014
Data elements	Data definition standards
DE	Data Elements
FABS	Financial Assistance Broker Submission
FAEC	Federal Audit Executive Council
FAIN	Federal Award Identification Number
FAR	Federal Acquisition Regulations
FFATA	Federal Funding Accountability and Transparency Act of 2006
FPDS-NG	Federal Procurement Data System - Next Generation
FSRS	Subaward Reporting Systems
FSSP	Federal Shared Services Provider
FY	Fiscal Year
GAO	Government Accountability Office
GTAS	Government-wide Treasury Account Symbol Adjusted Trial Balance System
IBC	Interior Business Center
IDD	Interface Definition Document
NAICS	North American Industry Classification System
OFF	Oracle Federal Financial
OIG	Office of Inspector General
OMB	Office of Management and Budget
OMB Circular No. A-11	OMB Circular No. A-11, Preparation, Submission and Execution of the Budget
OMB M-20-21	OMB M-20-21, Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19)
PIID	Procurement Instrument Identifier
POP	Period of Performance
QAP	Quality Assurance Program
RSS	Reporting Submission Specification
SAM	System for Award Management
SAO	Senior Accountable Official
SF-133	Standard Form - 133 Report on Budget Execution and Budgetary Resources
SF-1449	Standard Form - 1449 Solicitation/Contract/Order For Commercial
SOC	Service Organization Control
TAS	Treasury Account Symbols
Treasury	The United States Department of the Treasury
URI	Unique Record Identifier