



UNITED STATES OF AMERICA
CONSUMER PRODUCT
SAFETY COMMISSION

OFFICE OF THE INSPECTOR GENERAL

DATA ACT READINESS REVIEW

Issued: March 17, 2017



U.S. CONSUMER PRODUCT SAFETY COMMISSION
BETHESDA, MD 20814

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Date: March 17, 2017

TO : Ann Marie Buerkle, Chairman
Robert S. Adler, Commissioner
Marietta S. Robinson, Commissioner
Elliot F. Kaye, Commissioner
Joseph P. Mohorovic, Commissioner

FROM : Christopher W. Dentel, Inspector General

SUBJECT : Data Act Readiness Review

Based on our review, the CPSC is on track to meet its reporting obligations under the Digital Accountability and Transparency Act of 2014¹ (DATA Act). The DATA Act requires Federal agencies to report financial and spending information using specific, government-wide data standards. The DATA Act functions as an amendment to the Federal Funding Accountability and Transparency Act of 2006² (FFATA). FFATA requires that information on Federal Awards and expenditures be made available to the public via a single, searchable website (www.usaspending.gov). Historically, a problem with the interpretation and use of Federal financial and spending information has been the lack of standardization between Federal agencies in how such information is reported. The DATA Act requires the Office of Management and Budget (OMB) and the Department of Treasury (Treasury) to develop and define standardized data elements and to issue implementation guidance to Federal agencies. Fifty-Seven standardized data elements were released in phases from May to August 2015. Further, agencies were provided an 8-step implementation plan in June 2015, which was subsequently updated in June 2016. The DATA Act requires Inspectors General to review the completeness, timeliness, quality, and accuracy of data submitted by their respective agencies. The above referenced Inspector General review will occur after the CPSC makes its first DATA Act required report in May of 2017. That review will take the form of an audit and will be performed in accordance with generally accepted government auditing standards.

¹ Public Law 113-101, May 9, 2014

² Public Law 109-282, September 26, 2006

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This review was not an audit; therefore, it was not performed in accordance with generally accepted government auditing standards. The CPSC Office of Inspector General (OIG) performed this review using the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Quality Standards for Inspections and Evaluations. The OIG also used the Federal Audit Executive Council (FAEC) DATA Act Working Group's Readiness Review Guide version 2.0 issued June 2, 2016. The Readiness Review Guide incorporates the guidance issued by OMB and Treasury, including the 8-step implementation plan. The OIG assessed the CPSC's progress and future implementation plans based on interviews and documentation.

Overall, the CPSC's implementation plans are progressing on schedule to comply with the requisite reporting requirements by the May 2017 deadline. The Office of Planning, Budget and Evaluation (EXFM) is responsible for implementing the DATA Act. The CPSC uses an accounting shared service provider, Enterprise Services Center (ESC), who is assisting with implementation. The CPSC will be relying on ESC to implement the later steps of the implementation plan. The CPSC has identified all 57 data elements and the data systems from which they will be obtained. They also identified elements that were not being captured and made the necessary changes to their systems to capture them.

Management generally agreed with our findings. However, they disagreed with our assertion that, prior to October 2016, the name of the Senior Agency Official (SAO), the official responsible for implementing the DATA Act, was not listed on the DATA Act implementation community website at www.max.gov, and neither the SAO nor his designee participated in any of the SAO meetings held with OMB and Treasury. Management asserts that the, "... CPSC designee has been participating in the OMB and Treasury led status update meetings for the duration of the DATA Act implementation . . ." We agree that there is evidence that the CPSC designee did participate in meetings held by CPSC's accounting service provider, ESC, regarding DATA Act implementation. However, after reviewing the meeting notes maintained by OMB and Treasury, dating back to April 2015, we found no evidence that the CPSC designee participated in the SAO meetings held by OMB and Treasury. We are confident that the evidence supports our finding that neither the SAO nor designee participated in any of the SAO meetings held with OMB and Treasury. Should you have any questions, please feel free to contact me.


Christopher W. Dentel
Inspector General

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EXECUTIVE SUMMARY

BACKGROUND:

The Digital Accountability and Transparency Act of 2014¹ (DATA Act) requires Federal agencies to report financial and spending information using specific, government-wide data standards. The DATA Act functions as an amendment to the Federal Funding Accountability and Transparency Act of 2006² (FFATA). FFATA requires that information on Federal Awards and expenditures be made available to the public via a single, searchable website (www.usaspending.gov). The DATA Act requires the Office of Management and Budget (OMB) and the Department of Treasury (Treasury) to develop and define the standardized data elements and issue guidance to Federal agencies. Fifty-Seven standardized data elements were released in phases from May to August 2015. Further, agencies were provided an 8-step implementation plan in June 2015, which was subsequently updated in June 2016. The DATA Act requires Inspectors General (IG) to review the completeness, timeliness, quality, and accuracy of data submitted by their respective agencies.

The CPSC Office of Inspector General (OIG) performed this review using the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Quality Standards for Inspections and Evaluations. The OIG also used the Federal Audit Executive Council (FAEC) DATA Act Working Group's Readiness Review Guide version 2.0 issued June 2, 2016. The Readiness Review Guide incorporates the guidance issued by OMB and Treasury, including the 8-step implementation plan. The OIG assessed the CPSC's progress and future implementation plans based on interviews and documentation.

RESULTS OF REVIEW AND FINDINGS

Overall, the CPSC's implementation plans are progressing on schedule to comply with the reporting requirements by May 2017. The Office of Planning, Budget and Evaluation (EXFM) is responsible for implementing the DATA Act. The CPSC uses an accounting shared service provider, Enterprise Services Center (ESC), who is assisting with implementation. The CPSC will be relying on ESC to implement the later steps of the implementation plan. The CPSC has identified all 57 data elements and the data systems from which they will be obtained. They identified elements that were not being captured and made the necessary changes to their systems to capture them.

The CPSC has designated its Chief Financial Officer (CFO) as the Senior Accountable Official (SAO). The SAO is the single point of contact for the agency with OMB and Treasury. Prior to October 2016, the CFO's name as the SAO was not listed on the DATA Act implementation community website at www.max.gov, nor has the SAO or designee participated in any of the

¹ Public Law 113-101, May 9, 2014

² Public Law 109-282, September 26, 2006

SAO meetings held with OMB and Treasury. There is no requirement for the SAO to be listed or to attend meetings. However, a recent Treasury OIG audit³ found that the SAOs of all Federal agencies covered under the DATA Act need to be identified. The report found that Treasury's listing of SAOs is incomplete, with most of the omissions attributable to smaller agencies. This may hamper the ability of Treasury and OMB to communicate with agencies to facilitate compliance. Changes from OMB and Treasury regarding DATA Act implementation are communicated through regular meetings between CPSC and ESC, the CPSC accounting service provider. The CPSC's SAO is ultimately responsible for the CPSC's compliance with the DATA Act. Listing the CPSC's SAO on the DATA Act implementation community website and having the SAO attending SAO meetings will enhance transparency between the CPSC, ESC, and Treasury/OMB. The CFO/SAO's name was listed on the DATA Act community website in October 2016.

MANAGEMENT RESPONSE

Management generally agreed with our findings, however, they assert that the, “. . . CPSC designee has been participating in the OMB and Treasury led status update meetings for the duration of the DATA Act implementation . . .” We agree that there is evidence that the CPSC designee did participate in meetings held by their accounting service provider, ESC, regarding DATA Act implementation. However, after reviewing the meeting notes maintained by OMB and Treasury, dating back to April 2015, we found no evidence that the CPSC designee participated in the SAO meetings held by OMB and Treasury. We are confident that the evidence supports our finding that neither the SAO nor designee participated in any of the SAO meetings held with OMB and Treasury.

³ *Treasury's Government-wide DATA Act Implementation Continues, But Project Management Concerns Remain*, (Report no. OIG-16-047), Department of Treasury Office of Inspector General, June 22, 2016.

RESULTS AND FINDINGS

The SAO Not Attending Meetings

The CPSC has designated the Chief Financial Officer (CFO) as the SAO. The CPSC's SAO is ultimately responsible for the agency's compliance with the DATA Act. However, prior to October 2016, the DATA Act implementation community website at www.max.gov did not include the CFO's name as the SAO or indicate that the SAO participated in any of the SAO meetings held by OMB and Treasury. While there is no requirement to list the SAO or to attend these meetings, a recent Treasury OIG audit⁴ found that all Federal agencies covered under the DATA Act need to be identified. The report found that Treasury's listing of SAOs was incomplete, with most of the omissions attributable to smaller agencies. This may hamper the ability of Treasury and OMB to communicate with agencies to facilitate compliance. Changes from OMB and Treasury are communicated through regular meetings between CPSC and ESC, the CPSC accounting service provider. Listing the SAO and attending monthly SAO meetings will enhance transparency between CPSC, ESC, and Treasury/OMB. The SAO for the CPSC was listed on the DATA Act community website in October 2016.

8-Step Implementation Plan

The following pages include the 8-step implementation plan issued by OMB and Treasury as well as the OIG's assessment of the CPSC implementation of these steps.

⁴ *Treasury's Government-wide DATA Act Implementation Continues, But Project Management Concerns Remain*, (Report no. OIG-16-047), Department of Treasury Office of Inspector General, June 22, 2016.

Step 1 – Organize Team

Milestone	Details	OIG Comments
Designate Senior Accountable Official (SAO)	SAO is responsible for their agency’s implementation, which includes overseeing the governance and progress of the workgroup.	The CPSC designated the CFO as the SAO with the Director of the Office of Financial Services (FMFS) leading the implementation project.
Form workgroup 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.	Personnel from FMFS and the Office of Procurement Services (FMPS) are in CPSC's DATA Act working group. They are also working with personnel from ESC, their shared service provider.
Review 8-step plan 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.	The CPSC has developed an implementation plan dated September 15, 2015. This plan is a supplement to ESC's implementation plan. The CPSC has developed an internal plan that details the responsible parties and timelines for completion.

Step 2 – Review Elements

Milestone	Details	OIG Comments
<p>Read OMB policy guidance M-15-12</p>	<p>Read guidance and identify key requirements, along with remaining questions and clarifications needed from OMB and Treasury. OMB guidance is available at https://www.whitehouse.gov/sites/default/files/omb/memoranda/2015/m-15-12.pdf</p>	<p>The OIG has determined that the CPSC's working group received guidance and key requirements provided by OMB, Treasury and ESC.</p>
<p>Review DATA Act Definition Standards for data elements</p>	<p>Treasury and OMB posted data standards on http://fedspendingtransparency.github.io/dataelements/ and finalized data element definitions are available on https://max.gov/maxportal/assets/public/offm/DataStandardsFinal.htm.</p>	<p>The OIG has determined that the CPSC has reviewed the definition standards for the data elements. They have identified all the 57 required elements and the data systems from which the data will be obtained.</p>
<p>Communicate feedback and questions to OMB and Treasury</p>	<p>Agencies can also review the existing USAspending.gov data elements, which need to be captured in addition to the standardized elements. Agencies had an opportunity to provide feedback on OMB/Treasury policy decisions through advisory councils such as Award Committee for E-Government, Financial Assistance Committee for E-government, and Procurement Committee for E-government along with the Inter-Agency Advisory Committee. Feedback on data standards can also be submitted on http://fedspendingtransparency.github.io/. Agencies may also submit clarification and policy questions to DATAPMO@fiscal.treasury.gov.</p>	<p>According to the CPSC, there have been no specific questions or inquiries submitted to OMB or Treasury.</p>

Step 3 – Inventory Data

Milestone	Details	OIG Comments
Locate 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.	The CPSC has identified the required data elements and the systems from where the data will be obtained. The CPSC will provide 48 non-financial data elements to ESC, while ESC will provide the remaining 9 financial data elements. Further, ESC will link the financial and non-financial data elements.
Document systems, processes, and policies 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.	The CPSC has identified three primary systems from which it will obtain the necessary data: ESC’s Delphi, PRISM, and Grant Solutions. Delphi contains the financial data and elements; PRISM contains procurement data and elements; and the Grant Solutions contains grant data.
Identify gaps in agency systems and processes	Document the role of FSSPs and enterprise resource planning vendors, along with planning migrations and changes to information technology systems. Review the DATA Act requirements and finalized DATA Act Definition Standards. Identify anticipated gaps and incompleteness of data, such as whether Award ID, object class, and program activity are recorded in financial systems.	When submitting the implementation plan, the CPSC identified 5 data elements that were not being captured. To resolve this gap, the CPSC identified the systems that contained the data elements required and implemented changes to capture those elements.
Brainstorm potential improvements to agency systems, processes, and policies	Determine ways the agency can potentially tweak systems and processes to improve data quality and better streamline agency analytical, management, and reporting compliance activities.	The CPSC is working with Compusearch to make the necessary changes to capture all of the required data elements.

Step 4 – Design and Strategize

Milestone	Details	OIG Comments
Establish leads 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.	While the Director of FMFS is leading implantation of the DATA Act, the CPSC working group includes personnel from FMFS and FMPS. ESC, the CPSC’s accounting shared service provider, is also involved in the implementation.
Plan to capture all 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 FSSPs.	The CPSC has now identified all of the required elements and the systems. Initially, there were five elements that were not being captured. To address this gap, the CPSC identified the appropriate systems capable of capturing the needed data elements and implemented changes to those systems to allow them to capture said data elements.
Plan linkage 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.	This step is in progress. The CPSC is working with ESC to link the financial and non-financial data by Award ID. ESC will perform the linking of financial and non-financial data with a targeted completion date of January 1, 2017.
Submit implementation plans to OMB	After an initial inventory of DATA Act elements, processes, and systems, agency workgroups submit their DATA Act implementation plans.	The CPSC submitted their initial implementation plan to OMB in September 2015. This plan supplements ESC’s implementation plan. Since then, CPSC has not updated their implementation plan. However, ESC updated their implementation plan in July 2016.

Step 5 – Preparing Data for Submission to the Broker

Milestone	Details	OIG Comments
Review RSS/IDD documentation	Review Reporting Submission Specification (RSS) ⁵ / Interface Definition Document (IDD) ⁶ with relevant SMEs and other team members as appropriate. Documentation available on MAX at https://community.max.gov/x/CIbyL .	The OIG has evidence that CPSC has reviewed RSS/IDD documentation.
Build "mapping engine" that populates DATA Act Schema with agency data	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.	ESC performed and completed this step in October 2016.
Build extracts to conform to DATA Act Schema	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 (award and awardee attributes for financial assistance data) file.	The CPSC and ESC have built extracts for files A (appropriation summary level data aligned with SF133 reporting) and B (obligation and outlay information at program activity and object class level). File C (obligations at award and object class level) is scheduled to be completed by January 1, 2017.
Implement system changes to capture data	Sample and test validity for data and compliance with DATA Act Schema utilizing the Broker ⁷ . Based on results of testing, make plans to improve data quality and tweak the IT architecture and system updates.	The CPSC is working with Compusearch to make the necessary changes to capture all of the required data elements.

⁵ A listing of the data elements with specific instructions for Federal agencies to submit content in the appropriate format.

⁶ A listing of the elements, with supporting metadata to understand what data will be pulled from government-wide systems for procurement and from agency financial assistance systems.

⁷ The DATA Act Broker is a software layer that collects agency data, validates the data against the DATA Act Schema, and ultimately allows agencies to submit their data for publication.

Step 6 –Test Broker Outputs and Ensure Data are Valid

Milestone	Details	OIG Comments
Build method to retrieve data 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.	ESC will perform this step. As of October 2016, performance has not started.
Utilize Broker "validation engine" 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.	ESC will perform this step. As of October 2016, performance has not started yet.
Revise extracts 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.	ESC will validate the data. The CPSC will receive a report detailing any errors. CPSC will reconcile the errors and once they are resolved or determined to be within a certain threshold, the SAO will certify the data and it is uploaded to usaspending.gov .
Build method to transfer data 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.	ESC will perform this step. As of October 2016, performance has not started.
Test submission process to Treasury	Verify data are accurately and consistently transferred to Treasury. Also, make sure data conform with Treasury and agency IT security protocols.	ESC will perform this step. As of October 2016, performance has not started.

Steps 7 & 8 – Update and Submit

Milestone	Details	OIG Comments
Test submission process to Treasury	Verify data are accurately and consistently transferred to Treasury. Also make sure data conform with Treasury and agency IT security protocols.	ESC will perform this step. As of October 2016, performance has not started.
Re-test data transfer processes as needed	As new data are captured, re-test the IT architecture that retrieves the data and maps it to the DATA Act Schema.	ESC will perform this step. As of October 2016, performance has not started.
Submit to Treasury	Be sure to verify data are fully submitted. Update agency plans and system updates as needed to improve transparency and operational effectiveness.	ESC will perform this step. As of October 2016, performance has not started.

APPENDIX A: BACKGROUND

The DATA Act⁸ requires Federal agencies to report financial and spending information using specific, government-wide data standards as amended by FFATA⁹. FFATA requires that information on Federal Awards and expenditures be made available to the public via a single, searchable website (www.usaspending.gov).

The DATA Act requires OMB and Treasury to develop the data standards and issue guidance to Federal agencies. It also requires Federal agencies to start reporting financial and spending information using the developed data standards by May 8, 2017. OMB and Treasury established 57 data elements encompassing financial, procurement and grant information. The data standards for these 57 elements were released in phases from May to August 2015.

OMB issued guidance to Federal agencies on May 8, 2015¹⁰ on implementing the government-wide data standards required by the DATA Act and on the agencies' ongoing responsibilities for USAspending.gov. The guidance required agencies to (1) make agency-level financial data available for publication, (2) implement data definition standards, (3) implement data exchange standards and (4) ensure data quality and future reporting capabilities remain consistent with DATA Act implementation efforts. The guidance also requires agencies to develop a DATA Act implementation plan that (1) identify an SAO, (2) estimate resource requirements, (3) propose an implementation timeline, and (4) identify foreseeable challenges and resolutions. OMB issued additional guidance a year later¹¹ establishing the authoritative sources to be used by Federal agencies for DATA Act reporting. It also discusses the requirement for Federal agencies to associate data in financial systems with a unique award identifier to facilitate linkage between appropriation account summary-level data and award-level data.

Treasury issued the DATA Act Implementation Playbook (Version 1.0) in June 2015 to assist agencies in meeting their reporting requirements under the DATA Act. This playbook details the vision and objectives of the DATA Act as well as an 8-step implementation plan and timeline. Table 1, below, describes these eight steps:

Table 1. Treasury's 8-Step Implementation Plan

1) Organize Team
Create an agency DATA Act work group including impacted communities (e.g. CIO, Budget, Accounting, etc.) and identify Senior Accountable Official (SAO)
2) Review Elements
Review list of DATA Act elements and participate in data definitions standardization
3) Inventory Data

⁸ Public Law 113-101, May 9, 2014

⁹ Public Law 109-282, September 26, 2006

¹⁰ OMB Memorandum M-15-12, "Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable", May 8, 2015.

¹¹ OMB Management Procedures Memorandum (MPM) No. 2016-03, "Additional Guidelines for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information", May 3, 2016.

	Perform inventory of agency data and associated business processes.
4)	Design & strategize Plan changes (e.g., adding Award IDs to financial systems) to systems and business processes to capture data that are complete multi-level (e.g., Summary and award detail) fully-linked data.
5)	Prepare Data for Submission to the Broker Implement system changes and extract data iteratively (includes mapping of data from agency schema to the DATA Act Schema) .
6)	Test Broker Implementation Test Broker outputs to ensure data are valid iteratively.
7)	Update systems Implement other changes iteratively (e.g., establish linkages between program and financial data, capture any new data).
8)	Submit Data Update and refine process (repeat 5-7 as needed).

Treasury issued version 2.0 of the DATA Act Implementation playbook in June 2016. This version updates the recommended steps and guidance, consistent with the progress made since the issuance of version 1.0.

The CPSC submitted their implementation plan to OMB and Treasury in September 2015. The CFO is the designated SAO with personnel from FMFS and FMPS serving in the implementation working group. The CPSC is working closely with ESC¹², their shared accounting service provider, to ensure proper implementation. The CPSC will provide the 48 non-financial data elements to ESC, who will provide the remaining nine financial data elements. ESC will then merge the financial data with the non-financial data and submit the file to Treasury. Table 2 below summarizes the duties for ESC and the CPSC.

Table 2. Duties of CPSC and ESC for Complying with the DATA Act

Duties of ESC:	
	Provide 9 financial data elements.
	Merge/link the financial with the non-financial data elements.
	Review and reconcile the merged file prior to sending to Treasury.
	Transmit file with the 57 data elements to usaspending.gov .
Duties of CPSC:	
	Provide 48 non-financial data elements.
	Review and approve file in usaspending.gov .
Joint Duties of ESC and CPSC:	
	Resolve issues/inquiries on the 9 financial data elements.
	Resolve issues/inquiries on the 48 non-financial data elements.

¹² A division of the U.S. Department of Transportation that provides financial and information technology services to 21 different Federal agencies.

The CPSC also established a timeline for implementation and described the foreseeable challenges they may encounter in the implementation. These challenges included not capturing all of the required data elements (which has since been resolved), and consolidating and merging the data elements from three different reports, and then merging the results with the data in the financial system. The CPSC's implementation plan is a supplement to ESC's implementation plan. ESC submitted an updated implementation plan in July 2016.

The DATA Act requires IGs to review the completeness, timeliness, quality, and accuracy of data submitted by their respective agencies. The first reports were due to Congress by November 2016. However, agencies are not required to begin reporting until May 2017. The CIGIE identified this timing anomaly and as a result of this, the first IG reports will be issued by November 2017. Subsequent reports will be issued on a two-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.

APPENDIX B: OBJECTIVE, SCOPE and METHODOLOGY

The objective of this review was to assess the readiness and effectiveness of the CPSC's implementation of the DATA Act. To accomplish the objective, we;

- Reviewed and obtained an understanding of applicable laws, directives, guidance and regulations regarding CPSC's responsibilities for reporting under the DATA Act.
- Reviewed and obtained an understanding of CPSC's governance structure by interviewing key personnel and reviewing appropriate documentation.
- Reviewed the CPSC's and ESC's implementation plans to report financial and payment information under the DATA Act.
- Reviewed information from the DATA Act community website at www.max.gov.

The OIG conducted this review in accordance with the Quality Standards for Inspection and Evaluation established by the CIGIE and not the Generally Accepted Government Auditing Standards issued by the Government Accountability Office. The CIGIE standards require that we obtain sufficient data to provide a reasonable basis for reaching conclusions and require that we ensure evidence supporting findings, conclusions and recommendations is sufficient, competent, and relevant, such that a reasonable person would be able to sustain the findings, conclusions, and recommendations. The OIG also used the Federal Audit Executive Council's (FAEC) DATA Act Working Group's Readiness Review Guide version 2.0 issued June 2, 2016. The Readiness Review Guide incorporates the guidance issued from OMB and Treasury, including the 8-step implementation plan. Based on interviews and documentation obtained, the OIG assessed the CPSC's progress and future implementation plans.

APPENDIX C: MANAGEMENT COMMENTS



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

MEMORANDUM

February 13, 2017

TO: Christopher Dentel, Inspector General

FROM: Jay Hoffman, Chief Financial Officer

SUBJECT: DATA Act Compliance Readiness Review (June 1, 2015 to September 30, 2016)

We acknowledge receipt of your DATA Act Readiness review. We are satisfied with your review's conclusion that the CPSC's implementation plans are progressing on schedule to comply with the reporting requirements by May 2017. We further acknowledge your emphasis on the importance of good communication between Treasury, OMB, and the CPSC. To that end, the CPSC is now listed on the DATA Act implementation community website and regularly receives the weekly update from the Treasury Department. The CPSC designee has been participating in the OMB and Treasury led status update meetings for the duration of the DATA Act implementation; the Executive Summary of your review suggests there has been no participation by the CPSC designee.

Thank you for conducting this review and for the professionalism exhibited by your team.