



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES

January 26, 2017

FINAL MANAGEMENT INFORMATION REPORT

TO: Jason Gray
Chief Information Officer
Office of the Chief Information Officer

Tim Soltis
Delegated the Authority to Perform the Duties and Functions of the
Chief Financial Officer
Office of the Chief Financial Officer

FROM: Patrick J. Howard /s/
Assistant Inspector General for Audit

SUBJECT: The Department's Implementation of the DATA Act
Control Number ED-OIG/X19Q0001

This **Final Management Information Report** presents the results of our review of the U.S. Department of Education's (Department) implementation efforts related to the Digital Accountability and Transparency Act of 2014 (DATA Act). The objective of our audit was to gain an understanding of the processes, systems, and controls that the Department has implemented or plans to implement to report financial and payment data in accordance with the requirements of the DATA Act. Our audit was limited to steps 1 through 4 of the U.S. Department of the Treasury's (Treasury) DATA Act Implementation Playbook (Playbook).

We found that the Department has generally complied with Playbook requirements, appears to be meeting its milestones, and is on track for implementing the DATA Act reporting requirements. However, we noted that improvements are needed with regard to the Department's project management process. Specifically, we found that the Department lacked a designated project manager for its DATA Act implementation efforts as well as applicable project documentation regarding work performed.

BACKGROUND

The DATA Act enacted on May 9, 2014, aims to make information on Federal spending more easily accessible and transparent. The DATA Act requires that Federal agencies report financial and payment data in accordance with government-wide data standards established by the Office of Management and Budget (OMB) and Treasury. Agencies must report this information to USASpending.gov using the established data standards no later than May 9, 2017.

On May 8, 2015, OMB and Treasury issued guidance to Federal agencies on the reporting requirements of the DATA Act. In June 2015, Treasury’s DATA Act Program Management Office published the Playbook to assist agencies in meeting their reporting requirements under the DATA Act. The Playbook outlined an 8-step plan that provided suggested steps that agencies could use as they developed their methodology for DATA Act implementation. Table 1 below summarizes the steps in the Playbook.¹

Table 1: Agency 8-Step Plan

Step	Description
1) Organize Team	Create a DATA Act work group that includes impacted business areas (e.g., information technology, procurement, accounting, etc.) and identify a senior accountable official (SAO) who is responsible for the agency’s implementation of the DATA Act.
2) Review Elements	Review the DATA Act elements (including the standardized definitions) and determine how they relate to the agency’s business operations, information technology systems, and organization.
3) Inventory Data	Create an inventory of data and associated business processes, and identify appropriate source systems to extract needed data and understand gaps.
4) Design and Strategize	Plan changes to systems and business processes (e.g., link data contained in financial and management systems via an Award ID) and develop an implementation plan that includes addressing gaps in agency data.
5) Prepare Data for Submission to the Broker	Review the DATA Act schema; extract data from source systems; map agency data to the DATA Act schema; and implement system changes as needed to collect and link data.
6) Test Broker Implementation	Test Broker implementation outputs and ensure the data are valid.
7) Update Systems	Update the information and systems as needed (e.g., establish linkages between program and financial data, and capture any new data).
8) Submit Data	Submit required data to the Treasury for posting on USASpending.gov or a successor system.

The DATA Act requires agency oversight by the Office of Inspector General (OIG). The DATA Act requires OIGs to provide a report to Congress on spending data completeness, timeliness, quality, and accuracy no later than November 2016. However, agencies are not required to report spending data until May 2017. To address this reporting data anomaly, Inspectors General plan to provide Congress with their first required reports in November 2017, a 1-year delay from the statutory due date. Although the Council of the Inspectors General on Integrity and Efficiency (CIGIE) determined the best course of action was to delay the reports, it encouraged OIGs to undertake DATA Act “readiness reviews” well in advance of the revised due date which would allow OIGs to engage in oversight during the

¹ The Playbook was updated in June 2016. All Playbook citations within this report are from the 2016 version. No significant revisions to the citations were noted from the previous version.

implementation process. On December 22, 2015, CIGIE's chair issued a letter memorializing the strategy for dealing with the reporting date issue and communicated it to the Senate Committee on Homeland Security and Government Affairs and the House Committee on Oversight and Government Reform.

OBSERVATIONS AND SUGGESTIONS

We found that the Department has generally complied with Playbook requirements and appears to be meeting its milestones. We did not find any evidence to indicate that the Department is not on track for implementing the DATA Act reporting requirements by the May 2017 deadline. However, we noted that improvements are needed with regard to the Department's project management process. Specifically, we found that the Department lacked a designated project manager for its DATA Act implementation efforts, as well as applicable project documentation regarding work performed. While it appears that the Department is currently on track to implement DATA Act requirements, these weaknesses may increase the risk of erroneous decision-making and future implementation delays.

In its response to the draft report, the Department agreed with the suggestion to strengthen project management over the DATA Act implementation efforts and noted related actions it has taken. The Department's comments are summarized below. We did not make any changes to the observations and suggestions as a result of the comments. The full text of the Department's response is included as Attachment 2 to this report.

Section 1 – The Department Has Generally Complied With DATA Act Playbook Requirements

We found that the Department generally complied with steps 1 through 4 of the Playbook.² The results of our review are detailed below.

Step 1: Organize Team

The Playbook states that the goal of Step 1 is to organize the implementation team. Agencies are required to identify a SAO who is responsible for the agency's implementation of the DATA Act. The agency will also create a DATA Act workgroup that includes members from across the organization and should include subject matter experts with strong experience in designing and creating the infrastructure of agency business and information technology solutions. According to the Playbook, during this step, agencies can next determine key implementation milestones, along with a workgroup governance structure and roles and responsibilities of people and offices within the agency.

² We did not evaluate the Department's efforts to address Steps 5-8 of the Playbook because components of these steps were not scheduled to be fully addressed until after our fieldwork completion date.

Governance Structure

We found that the Department created and documented a governance structure but it does not include all key parties involved in implementation. The Department's DATA Act governance structure was formally documented in the Department's *DATA Act of 2014 Implementation Plan* (Implementation Plan), dated September 14, 2015. The governance structure, which was updated in April 2016 and August 2016, identifies the SAO/DATA Act Chair (the Department's Chief Information Officer), the DATA Act Co-Chair (the Department's Acting Chief Financial Officer), the DATA Act Coordinator, and senior advisors within the Department. The governance structure also identifies key stakeholders from the Department's lines of business that serve as subject matter experts for the implementation.

The DATA Act Co-Chair noted that the Office of the Chief Financial Officer (OCFO) led the first phase (Phase 1) of implementation and was primarily responsible for setting up the governance structure, setting up meetings, and coordinating responses between OMB and Treasury and Department stakeholders concerning the data elements and data inventory. A staff person within OCFO was named the DATA Act Coordinator and was placed in charge of this phase. He stated that the Office of the Chief Information Officer (OCIO) is leading the second phase (Phase 2), which consists of technical implementation and compliance with DATA Act requirements. The OCIO team (Technical Team) working on the DATA Act technical implementation is led by the OCIO Functional Applications Team Supervisor with oversight provided by OCIO's Financial System Services Director. OCIO has procured the services of a contractor to assist with implementation. The contractor's work includes reviewing data elements and participating in data definitions standardization, performing an inventory of agency data, designing and developing data files, and maintaining the project plan.

We found that the OCIO Technical Team, which the Department notes is performing much of the implementation, does not appear on the governance structure in either the initial Implementation Plan or the updated version submitted to OMB in August 2016. The DATA Act Coordinator and the Financial System Services Director both acknowledged that OCIO staff have been involved since the beginning of implementation and should appear on the governance structure. When asked why the structure had not been properly updated in August 2016, the DATA Act Coordinator stated he did not have the authority to make the change. The DATA Act Co-Chair stated that the governance structure was really more related to Phase 1, which is why the OCIO team is not on it.

Following the exit conference, the Department provided an updated governance structure dated October 18, 2016, that included the OCIO Technical Team.

Senior Accountable Official

The SAO is responsible for closely overseeing the governance and progress of his or her agency's DATA Act implementation. Since the start of implementation in March 2015, the Department has had four different individuals that have served as the SAO. The original SAO, who was the Department's Chief Information Officer (CIO), retired on February 29, 2016. The Deputy CIO served as the Acting SAO until April 30, 2016 when he left the Department. The Acting CIO subsequently served as the Acting SAO until the end of May 2016 when a new CIO was hired and formally assigned as the SAO.

The OCIO's Financial System Services Director stated that he had attended DATA Act-related meetings that the SAO would have attended during transition periods and when the Acting SAOs were unavailable. We note that during the transitions, the Department did not have representation in two of the three SAO conference calls held by OMB and Treasury. These calls included updates to agencies on topics including policy guidance, reporting architecture, and testing.

Work Group

The Department identified seven lines of business (grants, procurement, financial, budget, loans, travel, payroll) that would be impacted by the DATA Act and identified staff that appeared to have the appropriate subject matter expertise from each applicable area. The Department held a briefing for the lines of business team leads on their roles and responsibilities in April 2015. Of the seven lines of business, six have leads identified that have remained in their position since the start of implementation and all six noted that they have been involved in implementation work. In one line of business the Department identified a new lead after the original lead retired. According to the new lead, she was not aware that she had been assigned to the position, but that she would be the appropriate contact. Department officials noted that this line of business played a lesser role in implementation. The DATA Act Coordinator said that he thought they had reached out to the lead but noted it is possible she had not been informed.

The DATA Act Co-Chair noted that the working group is not a formal set of people holding regular meetings, as the DATA Act is moving very slowly as a result of Treasury working to get consensus on things throughout the Federal government and that many other agencies are having more trouble implementing the requirements than the Department. As a result, there is not a lot for the group to meet about.

Step 2: Review List of Elements and Participate in DATA Standardization Process

The goals of this step are to review the data elements and participate in the data element standardization process. The SAO and workgroup review the list of DATA Act elements, including the standardized definitions, and make sure they clearly understand how the elements are defined and if and how they are related to the agency's business operations, information technology systems, and organization. The SAO should also ensure the workgroup participates in data standardization via the appropriate advisory groups/Federal communities.

Data Elements Review and Standardization

We determined that the Department reviewed the data elements and participated in the data element standardization process. The Department developed a spreadsheet that lists the required data elements and the status of relevant white papers.³ The process was initially facilitated by the DATA Act Coordinator, who communicated with OMB and Treasury and sent out information to stakeholders within the Department. Our review of the spreadsheet, applicable correspondence on the Department's DATA Act SharePoint site, as well as discussions with the lines of business leads provided evidence that the DATA Act workgroup reviewed the data elements and white papers. The OCIO Technical Team also noted its review of the data elements and stated it held biweekly meetings that included participants from throughout the Department. Further, as part of its work on the Department's implementation of the DATA Act, the DATA Act contractor developed a Systems Requirement Specification document that outlined the data elements and definitions, which was reviewed and approved by the OCIO Technical Team. Lastly, we found that the Department assigned employees, including several members of the

³ The white papers, prepared by OMB and Treasury with input from agencies, lay forth the standardized definitions.

DATA Act workgroup, to each of the nine advisory groups listed in the Government-wide DATA Act governance structure.

Step 3: Perform Inventory of Agency Data and Associated Business Processes

After review of the data elements, the SAO and agency workgroup create an inventory of agency data and associated business processes. The SAO and workgroup trace how data elements are used across agency business processes, systems, and applications to identify the appropriate source system to extract the needed data and understand gaps (for example data that is not captured or is difficult to extract). The workgroup inventories how its elements, sources, and processes fit together. Agencies determine where there are gaps in the data that are collected.

Data Inventory

We found that the Department performed an inventory of its data. The DATA Act Coordinator facilitated an initial review with the lines of business leads, which provided input on source systems for the data elements. The OCIO Technical Team created a spreadsheet to identify where the required data would be extracted from and identified gaps. The OCIO Technical Team informed us of two identified gaps that were resolved by the team.

We found that the Department has been in communication with OMB and Treasury during its data element review and data inventory work. The Department has participated in meetings with OMB and Treasury and has provided feedback concerning data elements, which have been published on OMB's Max.gov website.

Step 4: Design and Strategize

The two main goals of this step are capturing an Award ID to link financial data to agency management systems and developing a comprehensive implementation plan, including solutions for addressing gaps in agency data.

System Design

The Department has identified mapping locations of Award ID linkages for financial assistance and procurement transactions. The Department's work focuses on four files, (A) Appropriations Account, (B) Object Class and Program Activity, (C) Award Financial, and (D2) Award and Awardee Attributes, Financial Assistance. The DATA Act contractor created a System Design Document (SDD) that describes how the requirements of the DATA Act are transformed into more technical system design specifications from which the system will be built. This document identifies the source information from which Files A, B, and C, which use the Department's systems, will be generated. The SDD notes that no system changes will be made to the Department's G5 and Contracting and Purchasing Support System (CPSS) and CPSSII systems.

Implementation Plans

The Department submitted its Implementation Plan in September 2015, and submitted an updated plan in August 2016, as required by OMB. We found that the plans contained the required information requested from OMB/Treasury. The Implementation Plans provided a timeline of milestones, estimate of costs to implement milestones, a detailed implementation narrative, and a detailed project plan.

The Department initially tracked its progress on its SharePoint site, but when the OCIO Technical Team began its work, the Department used a project plan maintained by the DATA Act contractor. The project plan sets start and finish milestone dates based on OMB and Treasury deadlines and includes deliverables and intermediate steps. The project plan is updated to reflect the progress that has been made on each item and is reviewed by the OCIO Technical Team lead. Our review of the timeline of milestones and project plan indicates the Department is meeting its planned dates. Department officials noted that meeting DATA Act requirements is like trying to hit a moving target. Every time OMB and Treasury meet with agencies for feedback, things are changed. The DATA Act Co-Chair noted that costs have increased as a result of changing requirements. Some of the Department's initial milestones have been set back by up to 6 months.⁴

The OCIO Technical Team lead stated that he holds biweekly meetings with individuals across the Department to update them on the status of the implementation. The DATA Act Coordinator stated he holds update sessions with Department leadership and other staff to facilitate collaboration and distributes updates from OMB and Treasury.

As part of its initial Implementation Plan submission, the Department provided cost projections for each step in the implementation process. The Department noted that it did not receive any additional funding for the implementation and would therefore focus on a strict compliance-only strategy for the short-term. Long-term efforts would require additional funding and would include improved data analytic capacity.

Section 2 – Improvements Are Needed in the Department's Overall Project Management

We found weaknesses in the Department's overall project management that could impact successful implementation of DATA Act requirements. Specifically, we found that the Department lacked a designated project manager until recently and did not have adequate documentation regarding the work performed. While it appears that the Department is currently on track to implement DATA Act requirements, these weaknesses may increase the risk of future delays in implementation or erroneous decisions.

Designation of Project Manager

We found that the Department did not assign an overall project manager to manage and coordinate the DATA Act implementation until recently. As noted above, the Department identified the SAO, the DATA Act Co-Chair, the DATA Act Coordinator, and senior advisors within the Department as part of the governance structure in its Implementation Plan. However, we noted that none of these positions included the same roles and responsibilities as a project manager. The DATA Act implementation consists of staff from multiple principal offices; however the project lacked a main point of contact for overall coordination, reporting, and accountability. This led to confusion between DATA Act staff in OCFO and OCIO over who was serving as a project manager. While officials in OCIO noted the DATA Act Coordinator would be considered the project manager, OCFO officials and the DATA Act Coordinator strongly disagreed and stated that his role was to primarily facilitate communication within the

⁴ The overall production implementation date in the Department's July 2016 project implementation plan has been changed from September 2016 to February 2017, but is still ahead of the required reporting date of May 2017.

Department and with OMB and Treasury. Since the OCIO Technical Team lead plays a key role in implementation, we asked if he was the project manager. He stated he was not, but stated he would be the person that should be held accountable in the event the data files did not meet requirements since OCIO and its contractor did the “meat” of the work. He did not know who would be held responsible for anything else since there really was not a formal structure.

The DATA Act Co-Chair noted that a project manager was not needed because OMB/Treasury determined the requirements and the Department was responding to their directives. He described the implementation as being a series of subprojects and that the Department is just reacting to requirements set by Treasury. He added that there is a project manager in Treasury since they are running the implementation and that you do not project manage unless you are in charge of the project. He said that ultimately this has been project-managed and the end result of timely implementation will prove that it was. When asked about accountability over implementation efforts, he noted that the OCIO team lead reported to the CIO.

The Project Management Institute’s A Guide to the Project Management Body of Knowledge (PMBOK Guide), Fifth Edition, 2013, is a recognized industry standard for project management best practices. The PMBOK Guide, Section 1.7, notes that the project manager is the person assigned by the performing organization to lead the team that is responsible for achieving the project objectives. The role of the project manager is distinct from a functional manager or operations manager, as the functional manager is typically focused on providing management oversight for a functional or business unit and operations managers are responsible for ensuring that business operations are efficient. Section 1.3 notes that managing a project typically includes identifying requirements; addressing the various needs, concerns, and expectations of the stakeholders as the project is planned and carried out; and balancing the competing project constraints.

During the exit conference on October 20, 2016, the OCIO Financial System Services Director stated that OCIO had assigned a project manager for the DATA Act implementation within the previous 2 weeks. According to the official, the assigned individual is a certified project manager. He noted the project manager is working with the lead on the OCIO Technical Team and the DATA Act Coordinator. When we asked the project manager what his roles and responsibilities entailed following the exit conference, he responded that he attends bi-weekly project meetings, ensures the meeting agenda is prepared, and ensures meeting notes are captured and distributed to attendees. This suggests that he may not have adequate responsibility or authority to fulfill the responsibilities of a project manager.

Without a designated project manager with full authority, the Department puts itself at risk of not having someone that is formally assigned the appropriate level of responsibility to ensure that the Department implements the DATA Act in accordance with requirements. Concern in this area is heightened by the turnover in the SAO position in the last several months, as noted in Section 1.

Maintenance of Project Documentation

We found that the Department was unable to provide documentation related to implementation activities, to include minutes and agendas of working group meetings, and key decisions made during the DATA Act implementation. The Department provided deliverables prepared by the contractor and other documentation that showed the end result of work performed, including a data element spreadsheet that identified mapping locations and a project timeline that listed steps, milestone dates, and completion status. However, the Department was unable to provide documentation noting who was involved in the decision-making or write-ups of key meetings.

We requested documentation to support implementation activities, including meeting agendas and minutes. Documentation provided was primarily deliverables prepared by the DATA Act contractor that we obtained from the Contracting Officer. The DATA Act Coordinator provided some meeting agendas from meetings occurring during the initial stages of implementation (Phase 1), however no formal minutes were kept and no attendee lists were provided. The agendas included four meetings with the SAO between September 2015 and March 2016, one meeting with OCFO in February 2015, and one with OCIO in August 2015. He indicated that he had set up a SharePoint site that was originally intended as a way for everyone to communicate with one another. We reviewed the site and noted very limited use by anyone other than the DATA Act Coordinator. He agreed that it was not used as expected.

Additionally, the OCIO Technical Team lead was unable to provide any meeting invitations, agendas, or meeting minutes for the biweekly meetings he indicated he was holding. As a result, we were unable to determine what was discussed and whether appropriate individuals were providing input, to include discussions surrounding data element review, data inventory, and system design. When asked who attended the meetings, the Technical Team lead provided a listing of people he normally invited to the meetings. He stated he normally invited about 32 people and about 10-12 of those regularly attended. He added that he invited who he thought was needed, including applicable lines of business representatives, and the DATA Act Coordinator would forward the invite to others. He stated his major concern was to make sure the Department was ready to report the data when it was required. There was no real guidance or directive on how to do so. He added that he had not been tracking this as a formal project.

Section 2.1.4 of the PMBOK Guide states that organizational process assets may be updated and added as necessary throughout the process. Organizational process assets include any artifact, practice, or knowledge from any or all of the organizations involved in the project that can be used to perform or govern the project. Section 10.2.3.4 notes that this includes project reports that describe project status and include issue logs, project presentations, feedback from stakeholders, and project records including correspondence, memos, meeting minutes and other documents describing the project. This information should, to the extent possible and appropriate, be maintained in an organized manner.

While we were able to determine that implementation steps contained in the Playbook were generally completed (see Section 1), without maintenance of appropriate documentation we were unable to determine what was discussed in key meetings and whether the right people were involved in decision-making.

Following the exit conference, the recently named project manager was able to locate a few meeting agendas and related minutes that the Department's DATA Act contractor had been keeping. The project manager noted that since being assigned as project manager he is ensuring meeting agendas are prepared and meeting notes are captured and distributed to meeting attendees.

Suggestions

While we found that the Department has made progress toward implementing DATA Act requirements and appears to be on track to meet the required reporting date, we suggest that the Department continue with its efforts to strengthen project management over DATA Act implementation efforts by ensuring that its newly assigned project manager is assigned the appropriate authority and responsibilities to effectively perform in that role and that he adequately documents project activities.

Department Comments

In its response to the draft report, the Department agreed with the suggestion to strengthen project management over the DATA Act implementation efforts. It stated that it has assigned a project manager to manage all aspects of the implementation of the DATA Act. It noted that the assigned project manager is certified by the Project Management Institute and is tasked to ensure all milestones are met as scheduled. The Department also stated that the project manager will ensure that all potential risks and corresponding mitigations are monitored and that all project decisions and activities related to the DATA Act implementation are documented.

OIG Response

As a result of the Department's comments, including its agreement to strengthen its project management of DATA Act implementation, we did not make any changes to the observations and suggestions.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of our audit was to gain an understanding of the processes, systems, and controls that the Department has implemented or plans to implement to report financial and payment data in accordance with the requirements of the DATA Act. Our review was limited to steps 1 through 4 of the Playbook. We did not evaluate the Department's efforts to address Steps 5-8 of the Playbook because components of these steps were not scheduled to be fully addressed until after our fieldwork completion date.

To accomplish our objective we obtained an understanding of the laws, legislation, directives, and guidance related to the Department's responsibilities to report financial and payment information under the DATA Act. We conducted interviews with the Department's DATA Act working groups responsible for the implementation of the DATA Act, including staff and management in OCFO and OCIO as well as each of the identified lines of business leads. We also reviewed documentation provided by the Department related to its work in organizing its DATA Act implementation working group, reviewing DATA Act elements, identifying Agency data inventories, and designing and strategizing its DATA Act implementation. Specifically, to determine whether the Department organized a DATA Act implementation working group and designed and strategized its DATA Act implementation, we reviewed the Department's DATA Act SharePoint site and OMB's Max.gov website, the Department's DATA Act implementation plans, and contractor prepared weekly status reports and DATA Act System Design Documents. To evaluate the Department's efforts to review DATA Act elements and identify Agency data inventories we reviewed the Department's completed data inventory and a contractor prepared DATA Act System Requirements Specification document. We did not review the accuracy and completeness of the Department's DATA Act elements and data inventories.

We conducted fieldwork at Department offices in Washington, D.C., during the period April 2016 through October 2016. We provided our audit results to Department officials during an exit conference conducted on October 20, 2016.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General.

In accordance with the Freedom of Information Act (5 U.S.C. § 552), reports issued by the Office of Inspector General are available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

We appreciate the cooperation given us during this review. If you have any questions, please call Michele Weaver-Dugan at (202) 245-6941.

Attachments

Attachment 1

Acronyms/Abbreviations Used in this Report

CIGIE	Council of the Inspectors General on Integrity and Efficiency
CIO	Chief Information Officer
CPSS	Contracting and Purchasing Support System
DATA Act	Digital Accountability and Transparency Act of 2014
Department	Department of Education
Implementation Plan	DATA Act of 2014 Implementation Plan
OCFO	Office of the Chief Financial Officer
OCIO	Office of the Chief Information Officer
OIG	Office of Inspector General
OMB	Office of Management and Budget
Playbook	DATA Act Implementation Playbook
PMBOK Guide	A Guide to the Project Management Body of Knowledge
SAO	Senior Accountable Official
SDD	System Design Document
Treasury	U.S. Department of the Treasury

Department Response to the Draft Report



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF THE CHIEF INFORMATION OFFICER

THE CHIEF INFORMATION OFFICER

December 30, 2016

Michele Weaver-Dugan, Director
Operations Internal Audit Team
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Reference: Audit Control Number ED-OIG/X19Q0001

Dear Ms. Weaver-Dugan:

In connection with your review and comments on the Department of Education's implementation of the DATA Act, the Department agrees with the OIG's recommendation to "strengthen project management over the DATA Act implementation efforts". As a result, the Department has assigned a Project Manager to manage all aspects of the implementation of the DATA Act. The assigned Project Manager is certified as a Project Manager by the Project Management Institute and is tasked to ensure all milestones are met as scheduled. Additionally, this Project Manager will ensure that all potential risks and their corresponding mitigations are monitored and that all project decisions and activities related to the DATA Act implementation are documented. OCIO has formally addressed the recommendations as outlined by the OIG in the *Draft Management Information Report- The Department's Implementation of the DATA Act*.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jason Gray".

Jason Gray