



**U.S. Department
of Transportation**

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Office of the Secretary
of Transportation

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MEMORANDUM TO: Heads of Operating Administrations
Chief Financial Officers
Chief Acquisitions Officers

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SUBJECT: Digital Accountability and Transparency Act of 2014 (DATA
Act) Treasury Broker Submission and Certification Process

As required by the Office of Management and Budget (OMB) memorandum M-15-12, *"Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable"*, the U.S. Department of Transportation (DOT) successfully met the DATA Act reporting requirements. Because these reporting requirements are ongoing, we want to provide guidance ensuring DOT's continued success and uniformity going forward.

Attached to this memorandum are the DOT procedures for the DATA Act Treasury Broker (Broker) Submission and Certification Process. This document provides a high-level explanation of each DOT Operating Administration's (OA's) responsibilities regarding daily, weekly, monthly, and quarterly activities. Although the Federal Aviation Administration (FAA) and the Saint Lawrence Seaway Development Corporation (SLSDC) are only required to follow the departmental quarterly activities because they do not use the Enterprise Services Center (ESC) on a regular basis, both OAs are required to meet all DATA Act and Federal Acquisition Regulation reporting requirements and should strive to align their individual processes to those outlined in the attached document.

Please ensure all staff involved in DATA Act reporting activities are aware of the attached procedures, which will remain in effect until modified by the Office of the Senior Procurement Executive (OSPE) and the Office of the Chief Financial Officer (OCFO). If you have any questions, please contact the DATA Act PMO at DATAACT@dot.gov.

Appendix A – Departmental Procedures for DATA Act Treasury Broker Submission and Certification

Daily / Weekly Activities

- OA staff report financial assistance awards to the Financial Assistance Broker Submissions (FABS) and associated financial transactions to Delphi on a recurring basis.
- Procurement staff report procurement awards to the Federal Procurement Data System – Next Generation (FPDS-NG) as procurement transactions occur.

It is critical that **all awards** are reported accurately, completely, and timely to the FABS, FPDS-NG, and Delphi.

Monthly Activities (FAA and SLSDC have individual internal processes)

- At the beginning of each month, the ESC provides each OA with a list of awards not reported in Delphi or USASpending.gov.
- OA staff is responsible for reconciling differences before the next Quarterly Reporting Submission.

Quarterly Activities

Fatal Error and Warnings Reports Analysis

When Treasury loads the Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS) reporting into the Broker:

- The ESC generates Files A, B, and C from Delphi for each OA and uploads them to the Broker.
- The Broker validates the files against the DATA Act Reporting Submission Specifications (RSS) and generates a Warnings Report for each file. The file identifies any Fatal Errors and Warnings.
- OA staff resolve all Fatal Errors.
- As Fatal Errors are resolved, the ESC regenerates and re-uploads Delphi files until the Broker validates that the files are free of Fatal Errors. When the Broker validates that the files are free of Fatal Errors, they will most likely still contain Warnings.
- When no Fatal Errors exist in Files A, B, and C for each OA, ESC generates DOT-wide Files for D1(Procurement)¹ and D2 (Financial Assistance)².
- The Broker cross-validates the data (File A to B, B to C, C to D1/D2).
- If Fatal Errors exist from this cross-validation, OA staff resolve them and the ESC regenerates and re-uploads Delphi files for revalidation in the Broker.
- Once the Broker confirms no Fatal Errors exist, the ESC generates a consolidated Warnings Report detailing all OA file validations (Files A, B and C) and cross-file validations (Files A to B, B to C, and C to D1/D2).
- The ESC summarizes the number of warnings by validation rule for each OA to review.

¹ File D1 (Procurement) contains award transactions with a “Sign Date” that corresponds with the reporting period.

² File D2 (Financial Assistance) contains award transactions with an “Action Date” that corresponds with the reporting period.

Categorical Justifications

- The OA DATA Act Point-of-Contact (POC) records the approved categorical justifications for each validation rule found in the consolidated Warnings Report.
- The OA DATA Act POC provides the information to his or her OA's DATA Act Accountable Officer (DAAO).

DATA Act Accountable Official Quarterly Certification

- The OA DAAO reviews his or her OA's Annotated Warnings Report and digitally signs the *DATA Act Accountable Official Quarterly Certification*.
- The signed *DATA Act Operating Administration Accountable Official Quarterly Certification* and the *Annotated OA DATA Act Warnings Report* are uploaded to the OA's folder for the specified reporting period on the DATA Act Certification SharePoint site.

Senior Accountable Official Submission

- As the OAs' DAAO certification documentation is uploaded, the SharePoint site generates notifications to the DATA Act mailbox.
- Staff from the Office of Financial Management (OST-B30) and the Office of the Senior Procurement Executive (OSPE) review the OA submissions and contact the OA DATA Act POC with questions as needed.
- Once all questions are answered, OST-B30 and OSPE coordinates with the DOT Senior Accountable Official (SAO) to prepare DOT's submission.
- Concurrently, the ESC produces, uploads, and validates a consolidated set of DOT-wide Files A, B, and C (including FAA and SLSDC data).
- The ESC generates DOT-wide Files D1 and D2, and cross-validates the DOT-wide files in the Broker.
- When the Broker confirms no Fatal Errors exist, ESC generates a consolidated warnings report detailing all DOT file validations (Files A, B, and C) and cross-file validations (Files A to B, B to C, and C to D1/D2), as well as a chart summarizing the number of warnings by validation rule for the DOT SAO to review.
- The ESC generates Files E and F in the Broker and then notifies the DOT SAO that the DOT quarterly submission is ready to be certified and submitted.
- The DOT SAO populates the comment boxes within the Broker, as needed, to clarify the Department's submission and certifies the final, consolidated DOT submission.
- Once certified, Treasury publishes the data on the USASpending.gov website for government and public access to allow oversight of spending across the federal government.

As necessary, the ESC will provide OAs a detailed quarterly certification timeline that coincides with GTAS reporting deadlines.