



*Office of Inspector General  
Export-Import Bank  
of the United States*

# **Independent Auditors' Report on EXIM's DATA Act Submission**

*November 8, 2021  
OIG-AR-22-01*

*The Export-Import Bank of the United States (EXIM or the Agency) is the official export credit agency of the United States (U.S.). EXIM is an independent, self-financing executive agency and a wholly-owned U.S. government corporation. EXIM's mission is to support jobs in the United States by facilitating the export of U.S. goods and services. EXIM provides competitive export financing and ensures a level playing field for U.S. exports in the global marketplace.*

*The Office of Inspector General (OIG), an independent office within EXIM, was statutorily created in 2002 and organized in 2007. The mission of EXIM OIG is to conduct and supervise audits, investigations, inspections, and evaluations related to the Agency's programs and operations; provide leadership and coordination as well as recommend policies that will promote economy, efficiency, and effectiveness in such programs and operations; and prevent and detect fraud, waste, abuse, and mismanagement.*

*This audit was conducted 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 objectives.*



*Office of Inspector General*

To: Howard Spira  
Senior Vice President and Chief Information Officer

From: Jennifer Fain  
Acting Inspector General 

Subject: Independent Auditors' Report on EXIM's DATA Act Submission  
(OIG-AR-22-01)

Date: November 8, 2021

This memorandum transmits the final report on the results of the independent audit of EXIM's DATA Act submission as of the second quarter of fiscal year 2021. Under a contract monitored by our office, we engaged Cotton & Company LLP (Cotton) to conduct the performance audit. The contract required the audit to be performed in accordance with generally accepted government auditing standards.

We appreciate the courtesies and cooperation extended to Cotton and this office during the audit. If you have any questions or comments regarding this audit report, please contact me at (202) 565-3439 or [jennifer.fain@exim.gov](mailto:jennifer.fain@exim.gov) or Courtney Potter at (202) 565-3976 or [courtney.potter@exim.gov](mailto:courtney.potter@exim.gov). You can obtain additional information about EXIM OIG and the Inspector General Act of 1978 at [www.exim.gov/about/oig](http://www.exim.gov/about/oig).



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November 8, 2021

Jennifer Fain  
Acting Inspector General  
Export-Import Bank  
811 Vermont Avenue, NW  
Washington, DC 20571

Subject: Independent Auditors' Report on EXIM's Digital Accountability and Transparency Act of 2014 (DATA Act) Submission

Dear Ms. Fain:

Please find attached Cotton & Company's final report on the results of our performance audit of the Export-Import Bank of the United States' (EXIM's or the Agency's) financial and award data reported for the second quarter of fiscal year 2021, as required by the DATA Act.

Please give me a call if you have any questions.

Sincerely,

Cotton & Company LLP

A handwritten signature in black ink that reads 'Catherine L. Nocera'.

Catherine L. Nocera, CPA, CISA  
Partner

# EXECUTIVE SUMMARY

Independent Auditor's Report on EXIM'S DATA Act  
Submission OIG-AR-22-01, November 8, 2021

## Why We Did This Audit

The Export-Import Bank of the United States (EXIM or the Agency) is subject to the requirements of the Digital Accountability and Transparency Act of 2014 (DATA Act). The DATA Act requires federal agencies to report financial and award information consistent with guidance established by the Office of Management and Budget (OMB) and the U.S. Department of the Treasury (Treasury). It also requires Inspectors General to review a statistically valid sample of the spending data and report on the completeness, timeliness, accuracy, and quality of the data, and the use of the government-wide data standards. EXIM's Office of Inspector General (OIG) contracted with Cotton & Company to conduct EXIM's fiscal year (FY) 2021 DATA Act performance audit.

## What We Recommend

We made 12 recommendations for EXIM to:

- (1) correct errors, identify risks, and modify policies and procedures to address risks associated with File D1 and D2 submissions, respectively;
- (2) continue to improve the design of its review of the procurement data and financial assistance award data submissions;
- (3 & 4) evaluate and update policies that address timeliness for submitting Federal Procurement Data System – Next Generation (FPDS-NG) and Financial Assistance Broker Submission (FABS) data;
- (5 & 7) complete a data inventory for each of Files A through D1;
- (6) establish policies and procedures to ensure appropriate use of DATA Act standards;
- (8) regularly review and update the data inventories;
- (9) develop, test, and implement a Data Quality Plan (DQP);
- (10) continue to implement a corrective action plan to correct for missing object class codes;
- (11) design and implement a File A reconciliation mapping process that includes all general ledger (GL) accounts; and
- (12) fully document the nature, cause, and resolution of variances that exist in the reconciliations.

## What We Found

The objectives of this performance audit were to assess: (1) the completeness, accuracy, timeliness, and quality of the financial and award data that EXIM submitted for publication on USASpending.gov; and (2) EXIM's implementation and use of the government-wide financial data standards established by OMB and Treasury. We determined that EXIM's processes for implementing and complying with the DATA Act requirements continue to improve; however, these processes are still maturing, and EXIM continues to have opportunities to improve the overall quality of its quarterly financial and award data, to strengthen its internal control processes and procedures to ensure compliance with the DATA Act standards and requirements, and to complete its DQP, which was required beginning in FY 2019.

EXIM submitted and certified its second quarter FY 2021 DATA Act files by the submission due date.

Based on the results of our statistical and non-statistical testing for EXIM's second quarter FY 2021 DATA Act submission, we assessed the quality of EXIM's data to be of higher quality. Based on our detailed tests of data elements for a statistically valid sample, the weighted projected error rates for accuracy, completeness, and timeliness are 2.09 percent, 0.11 percent, and 73.92 percent, respectively.

We determined that EXIM is not using two data standards as intended because it did not report negative subsidy amounts in the original loan subsidy cost data element for insurance transactions. Additionally, EXIM did not always provide procurement award descriptions that are easily understood or describe the goods and services procured or the purpose of award modifications.

We also determined that EXIM does not have a complete data inventory to govern its DATA Act activities and had not implemented and tested its DQP as of the end of FY 2021.

We found that EXIM did not always report an appropriate object class in its File B submission, resulting in incomplete reporting of spending data. We also found that EXIM did not fully document all reconciling differences in its File A reconciliation documentation.

We made 12 recommendations to improve EXIM's internal control activities to help ensure the quality of EXIM's financial and award data and EXIM's compliance with government-wide financial data standards.

For additional information, contact the Office of Inspector General at (202) 565-3908 or visit <http://exim.gov/about/oig>

## TABLE OF CONTENTS

EXECUTIVE SUMMARY .....	i
TABLE OF CONTENTS.....	ii
LIST OF TABLES.....	iii
ABBREVIATIONS AND GLOSSARY .....	4
INTRODUCTION.....	6
SCOPE AND METHODOLOGY .....	6
BACKGROUND.....	9
AUDIT RESULTS .....	11
Finding 1: EXIM’s Files D1 and D2 Data Were Not Always Accurate, Complete, and Timely.....	20
Finding 2: EXIM Did Not Implement the Data Standards as Defined for Certain Data Elements.....	31
Finding 3: EXIM Does Not Have a Complete Data Inventory to Govern Its DATA Act Activities .....	33
Finding 4: EXIM Did Not Complete a Data Quality Plan in a Timely Manner .....	35
Finding 5: EXIM’s Required Data Were Not Always Completely Reported .....	37
Finding 6: EXIM Did Not Fully Document File A Reconciling Differences.....	39
CONCLUSION.....	41
APPENDIXES .....	42
Appendix A: Sample Testing Results with Related Statistical Projections.....	42
Appendix B: Comparative Results from 2021 and 2019 DATA Act Audits .....	57
Appendix C: Management’s Response .....	59
Appendix D: Distribution List .....	64

## LIST OF TABLES

Table 1: Sampling Frame and Sample Size by Stratum.....	8
Table 2: Determination of Data Quality.....	12
Table 3: Weighted Sample Error Rates.....	13
Table 4: Characteristics Tested, Population, Sample, Projected Error Rates, and Projected Errors.....	15
Table 5: Accuracy of Dollar-Value Related Data Elements.....	17
Table 6: Data Element Containing Errors Not Attributable to EXIM.....	18
Table 7: File D1 Data Accuracy, Completeness, and Timeliness Errors.....	21
Table 8: File D2 Data Accuracy, Completeness, and Timeliness Errors.....	24
Table 9: File A Errors.....	40
Table 10: Data Elements Tested, Errors, Projected Error Rates, and Lower- and Upper-Limit Error Rates Accuracy Characteristic.....	42
Table 11: Data Elements Tested, Errors, Projected Error Rates, and Lower- and Upper-Limit Error Rates.....	46
Table 12: Data Elements Tested, Errors, Projected Error Rates, and Lower- and Upper-Limit Error Rates.....	52

**ABBREVIATIONS AND GLOSSARY**

APS	Application Processing System
CAR	Contract Action Report
CFDA	Catalog of Federal Domestic Assistance
CFO	Chief Financial Officer
CIGIE	Council of the Inspectors General on Integrity and Efficiency
CO	Contracting Officer
CPE	Current Period Ending
CS	Contract Specialist
DAIMS	DATA Act Information Model Schema
DATA Act	Digital Accountability and Transparency Act of 2014
DE	Data Element
DQP	Data Quality Plan
DUNS	Dun & Bradstreet Number
EOL	EXIM Online
EXIM	Export-Import Bank of the United States
FAEC	Federal Audit Executive Council
FABS	Financial Assistance Broker Submission
FAIN	Federal Award Identification Number
FAR	Federal Acquisition Regulation
FAQs	Frequently Asked Questions
FCRA	Federal Credit Reform Act of 1990
FFATA	Federal Funding Accountability and Transparency Act of 2006
FMS-NG	Financial Management System – Next Generation
FPDS-NG	Federal Procurement Data System – Next Generation
FSRS	FFATA Subaward Reporting System
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
GAO	U.S. Government Accountability Office
GSA	U.S. General Services Administration
GTAS	Government-wide Treasury Account Symbol Adjusted Trial Balance System

ICOR	Internal Control Over Reporting
ID	Identification
IDD	Interface Definition Document
NAICS	North American Industrial Classification System
OCFO	Office of the Chief Financial Officer
OIG	Office of Inspector General
OMB	Office of Management and Budget
P.L.	Public Law
PIID	Procurement Instrument Identifier
RSS	Reporting Submission Specification
SAM	System for Award Management
SAO	Senior Accountable Official
Treasury	U.S. Department of the Treasury
TAS	Treasury Account Symbol
URI	Unique Record Identifier
U.S.C.	United States Code

## INTRODUCTION

This report presents the results of Cotton & Company LLP's (Cotton & Company's) performance audit of the Export-Import Bank of the United States' (EXIM's or the Agency's) Digital Accountability and Transparency Act of 2014 (DATA Act)<sup>1</sup> financial and award data submission as of the second quarter of fiscal year (FY) 2021. The objectives of this performance audit were to assess: (1) the completeness, accuracy, timeliness, and quality of the financial and award data that EXIM submitted for publication on USASpending.gov; and (2) EXIM's implementation and use of the government-wide financial data standards established by the Office of Management and Budget (OMB) and the U.S. Department of the Treasury (Treasury).<sup>2</sup>

Cotton & Company conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS), as established in the Government Accountability Office's (GAO's) *Government Auditing Standards* (2018 Revision, Technical Update April 2021). 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 objectives. Due to the COVID-19 pandemic, we conducted our audit remotely from May through November 2021.

## SCOPE AND METHODOLOGY

The EXIM Office of Inspector General (OIG) contracted with Cotton & Company to conduct a performance audit of EXIM's reported financial and award data, as required by the DATA Act. The scope of our audit included EXIM's second quarter FY 2021 financial and award

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<sup>1</sup> [Public Law 113-101](#) (May 9, 2014).

<sup>2</sup> The Council of the Inspectors General on Integrity and Efficiency (CIGIE), Federal Audit Executive Council's (FAEC's) *Inspectors General Guide to Compliance under the DATA Act* (OIG-CA-21-008) defines completeness, accuracy, timeliness, and quality of data as follows:

- **Completeness** of data elements means for each of the required data elements that should have been reported, the data element was reported in the appropriate Files A through D2.
- **Accuracy** of data elements means amounts and other data relating to reported transactions have been recorded in accordance with the DATA Act Information Model Schema (DAIMS), Reporting Submission Specification (RSS), Interface Definition Document (IDD), and the online data dictionary, and agree with the original award documentation/contract file.
- **Timeliness** of data elements means for each of the required data elements that should have been reported, the data elements were reported in accordance with the reporting schedules defined by the financial, procurement and financial assistance requirements (Federal Funding Accountability and Transparency Act [FFATA], Federal Acquisition Regulation [FAR], Federal Procurement Data System – Next Generation [FPDS-NG], Financial Assistance Broker Submission [FABS], and DAIMS).
- **Quality** of data means data that are complete, accurate, and timely, and includes statistical and non-statistical testing results.

data that it submitted for publication on USASpending.gov, as well as EXIM's applicable procedures, certifications, documentation, and controls used in reporting these data.

To accomplish the objectives, we prepared an audit plan by reviewing the Council of the Inspectors General on Integrity and Efficiency (CIGIE), Federal Audit Executive Council's (FAEC's) *Inspectors General Guide to Compliance under the DATA Act* (OIG-CA-21-008) and adapting it to EXIM's environment. As part of our planning, we gained an understanding of EXIM's financial and award information and environment by reviewing relevant legislation, OMB memoranda, Treasury guidance, and audit reports issued by EXIM OIG, including audit reports related to internal controls over EXIM's information systems. We also reviewed relevant audit reports issued by GAO and Treasury's OIG. In addition, we obtained and reviewed EXIM's documentation of systems, processes, and internal controls related to reporting under the DATA Act to gain an understanding of EXIM's DATA Act governance structure and its processes, systems, and internal controls for DATA Act reporting.

We considered EXIM's internal controls over its DATA Act reporting to assist in determining the nature, extent, and timing of testing and to assess EXIM's implementation and use of the government-wide financial data standards. Specifically, we considered the design, implementation, and effectiveness of EXIM's controls for preparing, extracting, and reviewing its financial and award data submissions; assuring that the data are complete, accurate, timely, and of quality; adhering to government-wide financial data standards; and assuring that EXIM identifies and remedies data quality challenges. We also considered whether EXIM had deficiencies in the design, implementation, and operating effectiveness of general and application controls for the systems from which the data elements were derived and linked. To achieve this, we met with EXIM officials, including EXIM's Senior Accountable Official (SAO), the EXIM DATA Act Working Group (Working Group), and officials in the Office of the Chief Financial Officer (OCFO), and reviewed relevant documentation. In considering general and application controls, we reviewed EXIM's FY 2020 financial statements audit report and management letter and coordinated with EXIM OIG regarding its other related ongoing audits.

We reviewed EXIM's Data Quality Plan (DQP), which EXIM was required to prepare in accordance with OMB Memorandum M-18-16, Appendix A to OMB Circular No. A-123, *Management of Reporting and Data Integrity Risk*, effective June 6, 2018.

We obtained and reviewed the SAO's certification for EXIM's financial and award data submission for the second quarter of FY 2021, which stated that internal controls support the reliability and validity of EXIM's summary- and award-level data reported for publication on USASpending.gov. We also reviewed the SAO's supporting documentation to consider if controls enable the SAO to provide reasonable assurance that EXIM's financial and award data are complete, accurate, timely, and of quality.

We obtained EXIM's certified submission of financial and award data from the Treasury DATA Act Broker. We assessed EXIM's efforts to reconcile its File A: *Appropriations Account* and File B: *Object Class and Program Activity* to its trial balance as of March 31, 2021, and its SF-133, *Report on Budget Execution and Budgetary Resources*. We reconciled File A to the

adjusted trial balance as of March 31, 2021, and reconciled File A to File B. Finally, we assessed whether EXIM reported all required appropriation accounts and whether object classes and program activity codes conformed to OMB requirements. We tested linkages between File B and File C, and linkages between File C and Files D1 and D2.

We selected and tested a statistically valid sample of the financial and award data submitted by EXIM for publication on USASpending.gov, for the second quarter of FY 2021. We determined that Files D1, *Award (Procurement)* and D2, *Award (Financial Assistance)*<sup>3</sup> were a more suitable sampling frame (i.e., population) than File C, *Award Financial*. This is because EXIM does not report its loan, guarantee, and insurance programs in File C since the programs operate at either a zero or negative subsidy. In addition, awards that contain no cost modifications, (e.g., extending the period of performance) are reported in Files D1 or D2 but not in File C because these awards do not have a financial transaction associated with the modification. We stratified the sample frame between File D1 (Stratum 1) and D2 (Stratum 2) and selected a random attribute sample. We determined the sample size using a 95 percent confidence level, a 20 percent expected error rate,<sup>4</sup> a precision rate of 5 percent, and a sampling frame of 740 records. We determined that a sample size of 170 records was appropriate. We allocated the sample size between Stratum 1 and Stratum 2 using a 6.6 percent precision rate for each stratum and the stratum’s actual population size. We selected a random attribute sample for each stratum, for a total sample size of 170 records.

**Table 1: Sampling Frame and Sample Size by Stratum**

DATA Act File	Total Records	Records Sampled
Stratum 1 (File D1)	97	60
Stratum 2 (File D2)	<u>643</u>	<u>110</u>
<b>Total</b>	<b><u>740</u></b>	<b><u>170</u></b>

For each record (award) sampled, we: (1) tested applicable linkages between Files C, D1, and D2; and (2) determined the accuracy, completeness, and timeliness of the financial and non-financial information required by government-wide financial data standards. To determine accuracy, we verified the data against EXIM’s source systems and documents, including its accounting system of record, the Financial Management System – Next Generation (FMS-NG).<sup>5</sup> We also compared non-financial and additional awardee data elements to external sources, including the System for Award Management (SAM). We tested completeness by verifying whether each record sampled was recorded in the correct period and contained all of the required standardized data elements, and whether each data element conformed to the standard for that element. To test timeliness, we verified

<sup>3</sup> Per DAIMS Practices and Procedures for DATA Act Broker Submissions Version 2.1, financial assistance awards include grants, loans, direct payments, insurance, and other financial assistance. For EXIM, this includes its loans, guarantees, and insurance.

<sup>4</sup> We used a 20 percent estimated error rate based on the results of EXIM’s 2019 DATA Act audit.

<sup>5</sup> We verified loan, guarantee, and insurance awards using EXIM’s source systems: EXIM Online (EOL) and the Application Processing System (APS). We verified procurement award data using EXIM’s source system Comprizon, and contracts and other procurement documentation.

whether the data elements were reported in accordance with the reporting schedules defined by the financial, procurement, and financial assistance requirements (Federal Funding Accountability and Transparency Act of 2006 [FFATA], Federal Acquisition Regulation [FAR], Federal Procurement Data System – Next Generation [FPDS-NG], Financial Assistance Broker Submission [FABS], and DATA Act Information Model Schema [DAIMS]). We then assessed the quality of the information and EXIM’s adherence to the 59 data standards established by OMB and Treasury.<sup>6</sup>

We discussed our findings and conclusions with management officials on October 18, 2021, and provided management with a draft copy of our report on October 22, 2021. We included management’s comments and our responses where appropriate.

## BACKGROUND

EXIM is an independent, self-financing executive agency and a wholly-owned U.S. government corporation. The EXIM charter established by *The Export-Import Bank Act of 1945*, as amended through the *Further Consolidated Appropriations Act, 2020*, [Public Law 116-94](#) (Dec. 20, 2019)<sup>7</sup> (2019 Reauthorization), states:

*It is the policy of the United States to foster expansion of exports of manufactured goods, agricultural products, and other goods and services, thereby contributing to the promotion and maintenance of high levels of employment and real income, a commitment to reinvestment and job creation, and the increased development of the productive resources of the United States.*

The 2019 Reauthorization extended EXIM’s authorization through December 31, 2026.<sup>8</sup>

In pursuit of its mission of supporting U.S. exports, EXIM offers four types of financial programs supported by the full faith and credit of the U.S. Government:

- Direct loans
- Loan guarantees
- Working capital guarantees
- Export-credit insurance

In administering these programs, EXIM is subject to various laws pertaining to federal agencies, including the DATA Act, which was enacted on May 9, 2014. The DATA Act expands the requirements of FFATA<sup>9</sup> and requires OMB and Treasury to develop government-wide financial data standards and issue guidance to federal agencies.

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<sup>6</sup> For each error related to completeness, accuracy, and timeliness, we determined that an error in quality also existed.

<sup>7</sup> Certain provisions codified at 12 U.S.C. § 635, *et seq.*

<sup>8</sup> 12 U.S.C. § 635(f).

<sup>9</sup> 31 U.S.C. § 6101.

In May 2015, OMB and Treasury published 57 data definition standards (i.e., data elements)<sup>10</sup> and beginning in January 2017, required federal agencies to report financial and award data in accordance with these standards for DATA Act reporting. Treasury used these data definition standards to develop DAIMS, which was amended by version 2.0, implemented on July 13, 2020, followed by a maintenance release dated December 17, 2020, which was in effect during the second quarter of FY 2021's DATA Act submission. DAIMS is a standard classification and format, or language, for exchanging data and reporting to USASpending.gov. These standards identify the data elements that agencies must report, and define each of those elements, the relationships between the elements, and how agencies must collect and report the data. Treasury began displaying federal agencies' data on USASpending.gov for taxpayers and policymakers in May 2017.

On June 6, 2018, OMB issued M-18-16, which was an amendment to OMB Circular No. A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, Appendix A, *Internal Control Over Reporting* (ICOR). The amendment included a new requirement for agencies to develop and maintain a DQP to achieve the objectives of the DATA Act. The DQP should consider the incremental risks to data quality in federal spending data and any controls that would manage such risks in accordance with OMB Circular No. A-123. The DQP includes requirements such as a documented organizational structure, key processes providing internal controls for reporting spending information, a testing plan, identification of high-risk reported data, and actions taken to manage identified risks. EXIM must include consideration of the DQP in its OMB Circular No. A-123 annual assurance statement beginning in FY 2019 and continuing at least through the statement covering FY 2021.

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 the following changes to DATA Act reporting.

- Required agencies that received COVID-19 supplemental relief funding to submit DATA Act Files A, B, and C on a monthly basis starting with the June 2020 reporting period.
- Required these monthly submissions to include a running total of outlays for each award in File C funded with COVID-19 supplemental relief funds.
- Added two additional data elements significant in promoting full and transparent reporting and spending to the testing required under the DATA Act, increasing the number of applicable data elements to be tested to 59.

Under DAIMS, agencies must collect and report financial and award data in the following files:

- File A: *Appropriations Account*
- File B: *Object Class and Program Activity*

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<sup>10</sup> Requirements contained in OMB Issued M-20-21, *Implementation Guidance for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19)*, increased this to 59 applicable data elements.

- File C: *Award Financial*
- File D1: *Award (Procurement)*
- File D2: *Award (Financial Assistance)*
- File E: *Additional Awardee Attributes*
- File F: *Sub-Award Attributes*

Files A and B present summary-level financial information, while File C presents award-level financial information. EXIM is responsible for preparing these files and submitting them to the Treasury DATA Act Broker. Files D1, D2, E, and F present both financial and non-financial information, including demographic information. EXIM is not responsible for preparing these files. Instead, EXIM submits procurement, loan, guarantee, and insurance data to government-wide procurement and financial assistance systems, which feed into USASpending.gov.<sup>11</sup> The Treasury DATA Act Broker then extracts the information for Files D1, D2, E, and F from these government-wide procurement and financial assistance systems and from recipient and sub-award systems. Files E and F are the responsibility of the awardee in accordance with terms and Federal agreements.

OMB and Treasury DATA Act guidance also require that each agency designate an SAO. The SAO is responsible and accountable for the agency's data submission and must provide reasonable assurance that internal controls support the reliability and validity of DATA Act submissions, that Files A through D2 have the correct linkages and alignment, and that the data in each file are valid and reliable.

In addition to the agency reporting requirements, the DATA Act imposes oversight responsibilities on OIGs and the Comptroller General of the U.S. To assist the OIG community in performing the required reviews and set a baseline framework for the reviews, the FAEC formulated the FAEC DATA Act Working Group, which issued the *Inspectors General Guide to Compliance under the DATA Act* in February 2017 (OIG-CA-17-012). The FAEC DATA Act Working Group revised the guide in February 2019 (OIG-CA-19-012) and again in December 2020 [OIG-CA-21-008]. The guide presents a common methodology and reporting approach for the IG community to use in performing its mandated DATA Act work.

## AUDIT RESULTS

The objectives of this performance audit were to assess: (1) the accuracy, completeness, timeliness, and quality of EXIM's financial and award data submitted for publication on USASpending.gov; and (2) EXIM's implementation and use of the government-wide financial data standards established by OMB and Treasury.

The scope of this performance audit was one fiscal quarter of EXIM's financial and award data submitted for publication on USASpending.gov, and applicable procedures, certifications, documentation, and controls to achieve the process objectives. In selecting a

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<sup>11</sup> The government-wide procurement system is FPDS-NG. The government-wide financial assistance system is FABS.

fiscal quarter for audit, we considered a quarter from within the range of third quarter FY 2020 through the second quarter of FY 2021. We also considered whether the quarter was representative of agency spending; included pandemic-related spending transactions, if applicable; and allowed sufficient time to meet the mandatory audit deadline. Based on these criteria, we selected the second quarter of FY 2021 for audit.

We determined that EXIM’s processes for implementing and complying with the DATA Act requirements continue to improve; however, these processes are still maturing, and EXIM continues to have opportunities to: improve the overall quality of its quarterly financial and award data; strengthen its internal control processes and procedures to ensure compliance with the DATA Act standards; and complete its DQP, which was required beginning in FY 2019.

**QUALITY DETERMINATION**

**Overall Determination of Quality**

Based on the results of our statistical and non-statistical testing for EXIM’s DATA Act audit for the second quarter of FY 2021, EXIM scored 86.5 points, which is a quality rating of higher.

**Table 2: Determination of Data Quality**

CRITERIA	POINTS WITHOUT OVERLAYS (No COVID Funding)
630 Timeliness	5.0
640 Summary-Level Data	11.6
650 Suitability of File C	12.6
730 Record-Level Linkage	9.0
740 Data Element Testing	
Completeness	15.0
Accuracy	29.4
Timeliness	<u>3.9</u>
Total	86.5

**STATISTICAL RESULTS**

**Data Element Analysis**

The following table presents the analysis of results by data element.

**Table 3: Weighted Sample Error Rates**

EXIM'S RESULTS FOR DATA ELEMENTS <i>In Descending Order by Accuracy Error Rate</i>		WEIGHTED SAMPLE ERROR RATE <sup>12</sup>		
DAIMS Data Element Number*	Data Element Name	A Accuracy	C Completeness	T Timeliness
15*	Potential Total Value of Award	26.67%	0.00%	16.67%
27	Period of Performance Current End Date	20.83%	0.00%	12.50%
5*	Legal Entity Address	20.59%	0.00%	59.41%
13	Federal Action Obligation	17.06%	0.00%	59.41%
4*	Ultimate Parent Legal Entity Name	16.67%	3.57%	34.52%
14	Current Total Value of Award	16.67%	0.00%	12.50%
3*	Ultimate Parent Unique Identifier	16.05%	0.00%	30.86%
22	Award Description	7.65%	0.00%	59.41%
28	Period of Performance Potential End Date	6.25%	0.00%	12.50%
1*	Awardee/Recipient Legal Entity Name	5.29%	0.00%	59.41%
26	Period of Performance Start Date	5.00%	0.00%	16.67%
2	Awardee/Recipient Unique Identifier	4.12%	1.18%	59.41%
6*	Legal Entity Congressional District	3.29%	0.00%	64.47%
30*	Primary Place of Performance Address	2.74%	0.00%	65.07%
25	Action Date	2.35%	0.00%	59.41%
16*	Award Type	1.76%	0.00%	59.41%
17	North American Industrial Classification System (NAICS) Code	1.67%	0.00%	16.67%
31*	Primary Place of Performance Congressional District	1.39%	0.00%	64.58%
36*	Action Type	1.32%	0.00%	65.56%
32	Primary Place of Performance Country Code	0.63%	0.00%	61.39%
33*	Primary Place of Performance Country Name	0.63%	0.00%	61.39%
7*	Legal Entity Country Code	0.00%	0.00%	59.41%
8*	Legal Entity Country Name	0.00%	0.00%	59.41%
11*	Amount of Award	0.00%	0.00%	82.73%
12	Non-Federal Funding Amount	0.00%	0.00%	82.73%
18*	NAICS Description	0.00%	0.00%	16.67%
19	Catalog of Federal Domestic Assistance (CFDA) Number	0.00%	0.00%	82.73%
20*	CFDA Title	0.00%	0.00%	82.73%
23	Award Modification/ Amendment Number	0.00%	0.00%	59.41%
24	Parent Award Identification (ID) Number	0.00%	0.00%	22.86%
29	Ordering Period End Date	0.00%	0.00%	33.33%

<sup>12</sup> These error rates do not reflect projected error rates to the population; they are error rates of the sample alone. Please see Appendix A, *Sample Testing Results with Related Statistical Projections*, for projected error rates.

DAIMS Data Element Number*	Data Element Name	A Accuracy	C Completeness	T Timeliness
34	Award ID Number (Procurement Instrument Identifier [PIID]/Federal Award Identification Number [FAIN])	0.00%	0.00%	59.41%
35*	Record Type	0.00%	0.00%	82.73%
37*	Business Types	0.00%	0.00%	82.73%
38*	Funding Agency Name	0.00%	0.00%	59.41%
39*	Funding Agency Code	0.00%	0.00%	59.41%
40*	Funding Sub-Tier Agency Name	0.00%	0.00%	59.41%
41	Funding Sub-Tier Agency Code	0.00%	0.00%	59.41%
42*	Funding Office Name	0.00%	0.00%	59.41%
43	Funding Office Code	0.00%	0.00%	59.41%
44*	Awarding Agency Name	0.00%	0.00%	59.41%
45*	Awarding Agency Code	0.00%	0.00%	59.41%
46*	Awarding Sub-Tier Agency Name	0.00%	0.00%	59.41%
47	Awarding Sub-Tier Agency Code	0.00%	0.00%	59.41%
48*	Awarding Office Name	0.00%	0.00%	59.41%
49	Awarding Office Code	0.00%	0.00%	59.41%
50	Object Class	0.00%	0.00%	0.00%
51	Appropriations Account	0.00%	0.00%	0.00%
53	Obligation	0.00%	0.00%	0.00%
56	Program Activity	0.00%	0.00%	0.00%
163	National Interest Action	0.00%	0.00%	16.67%
430	Disaster Emergency Fund Code	0.00%	0.00%	0.00%
54	Unobligated Balance	n/a	n/a	n/a
57	Outlay (File C – Gross Outlay Amount by Award Current Period Ending [CPE])	n/a	n/a	n/a

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

The results summarized in the table above are consistent with risks identified in EXIM's partially complete DQP. In particular, EXIM identified risks associated with: data entered incorrectly or incompletely into the source systems; incomplete or inaccurate subsidy cost amounts; incomplete, inaccurate, or invalid data; and incomplete SAM data transfers/updates. EXIM's DQP documented risks associated with delays in uploading data, but primarily associated with delays in closing the accounting records at fiscal year-end.

### Accuracy – Projected Error Rate

The projected error rate for the accuracy of the data elements is 2.09 percent. A data element was considered accurate when amounts and other data relating to recorded transactions were recorded in accordance with the DAIMS Reporting Submission Specification (RSS), Interface Definition Document (IDD), and the online data dictionary, and agree with the originating award documentation/contract file.

Based on a 95 percent confidence level, the projected error rate for the accuracy of the data elements is between 0.85 percent and 5.80 percent.

**Completeness – Projected Error Rate**

The projected error rate for the completeness of the data elements is 0.11 percent. A data element was considered complete if the required data element that should have been reported was reported.

Based on a 95 percent confidence level, the projected error rate for the completeness of the data elements is between 0.00 percent and 0.22 percent.

**Timeliness – Projected Error Rate**

The projected error rate for the timeliness of the data elements is 73.92 percent. The timeliness of data elements was based on the reporting schedules defined by the financial, procurement, and financial assistance requirements (i.e., FFATA, FAR, FPDS-NG, FABS, and DAIMS).

Based on a 95 percent confidence level, the projected error rate for the timeliness of the data elements is between 67.30 percent and 79.15 percent.

**Table 4: Characteristics Tested, Population, Sample, Projected Error Rates, and Projected Errors**

Characteristic	Population			Sample			Projected Error Rates			Projected Errors		
	File D1	File D2	Total	File D1	File D2	Total	Project ed Error Rate	Weighted Lower-Limit Error Rate	Upper-Limit Error Rate	Projec ted Errors	Lower Error Limit	Upper Error Limit
Accuracy	97	643	740	60	110	170	2.09%	0.85%	5.80%	15	6	43
Completeness	97	643	740	60	110	170	0.11%	0.00%	0.22%	1	0	2
Timeliness	97	643	740	60	110	170	73.92%	67.30%	79.15%	547	498	586

Note: Projected error rates represent point estimates; lower and upper limits of error rates represent the minimum and maximum possible error rate at the 95 percent confidence level.

Please see Finding No. 1 for information regarding our assessment of EXIM’s internal control procedures related to accuracy, completeness, and timeliness of its Files D1 and D2 data.

**DATA STANDARDS**

**Implementation and Use of the Data Standards**

We have evaluated EXIM’s implementation and use of the government-wide financial data standards for spending information as developed by OMB and Treasury. We determined that EXIM is not using the following data standards as intended by OMB and Treasury:

**Negative Subsidy Amounts:** EXIM did not report its negative subsidy amounts in Data Element “Original Loan Subsidy Cost” for its insurance program awards.

**Award Description:** EXIM did not always provide procurement award descriptions that are easily understood and describe the goods or services procured or purpose of the award modifications.

In addition, EXIM does not have a complete data inventory to govern its DATA Act activities and help ensure compliance with government-wide financial data standards.

Please see Findings Nos. 2 and 3 below for information regarding our assessment of EXIM's internal control procedures related to its implementation of the government-wide financial data standards.

## **NON-STATISTICAL RESULTS**

### **Completeness of EXIM's DATA Act Submission**

We evaluated EXIM's second quarter of FY 2021 DATA Act submission to Treasury's DATA Act Broker and determined that the submission was complete. To be considered complete, 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 EXIM's DATA Act Submission**

We evaluated EXIM's second quarter of FY 2021 DATA Act submission to Treasury's DATA Act Broker and determined that the submission was timely. To be considered timely, the submission 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 for the following tests: (1) summary-level data from File A matched the Agency's Government-wide Treasury Account Symbol Adjusted Trial Balance System (GTAS) SF-133; and (2) the totals and Treasury Account Symbol (TAS) identified in File A matched File B. However, we identified that EXIM did not always report an appropriate object class code in File B. An appropriate object class code is one that matches codes defined in Section 83 of OMB Circular A-11. We determined this would have an adverse impact on the overall quality of the DATA Act submission, because data that does not contain valid object class codes does not convey useful information about the type of items or services purchased.

Please see Finding No. 5 below for information regarding our assessment of EXIM's internal control procedures related to the completeness of summary level data for File B.

### **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, File C to File D1 by both the PIID and Parent Award ID, and File C to File D2 by the FAIN or Unique Record Identifier (URI). All of the TAS, object class, and program activity data elements from File C existed in File B.

We identified one record in File D1 that was not reported in File C. This record was reported in File D1 when a contract was closed out in Comprizon; the contract was associated with a TAS that had been cancelled in a prior year and was therefore not reported in File C. We determined that this variance would not have an adverse impact on

the overall quality of the DATA Act submission, because it is not a recurring condition, and the transaction to close out the contract was reported.

Linkages between File C and D2 were not applicable; EXIM does not report its loan, guarantee, and insurance programs in File C because the programs operate at either zero or negative subsidy. Transactions related to negative subsidy are recorded in credit reform financing accounts, which are not included in File C. We also noted differences between File C and File D1, for which we did not expect there to be valid linkages. These included records in File D1 for no-cost modifications, that are not expected to be reported in File C, records in File D1 for contracts for collection services that were obligated in the credit reform financing account, and one record in File C that was under the micro-purchase threshold and therefore is not required to be included in File D1.

### Analysis of the Accuracy of Dollar-Value Related Data Elements

The table below presents test results for the sampled transactions regarding the accuracy of the dollar values reported for those data elements that contain a dollar value, including an error rate and the absolute value of the errors. We did not project the sample results to the population because we used an attribute sampling methodology that is not designed to measure the monetary misstatement in a population.

**Table 5: 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	60	0	0	60	0.00%	\$0
PIID	14 Current Total Value of Award	40	8	12	48	16.70%	\$2,911,000.05
PIID	15* Potential Total Value of Award	44	16	0	60	26.70%	\$18,772,759.15
PIID	53 Obligation	40	0	20	40	0.00%	\$0
FAIN	11* Amount of Award	110	0	0	110	0.00%	\$0
FAIN	12 Non- Federal Funding Amount	110	0	0	110	0.00%	\$0
FAIN	13 Federal Action Obligation	81	29	0	110	26.40%	\$174,858.60
FAIN	53 Obligation	0	0	110	0	N/A	\$0

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

**Analysis of Data Elements Containing Errors Not Attributed to EXIM**

The table below shows the data elements containing errors that are not attributable to EXIM. See Appendix A, *Sample Testing Results with Related Statistical Projections*, Tables 10 through 12 for information showing errors and projected error rates by data element.

Although some data elements are derived using data reported by EXIM, they are derived from sources that EXIM is not responsible for updating, such as SAM. Therefore, errors may occur because data reported by EXIM were inaccurate, or because of timing differences between the date the data were initially derived and the date testing was conducted if information contained in the source system was modified after the DATA Act submission date.

**Table 6: Data Element Containing Errors Not Attributable to EXIM**

PIID/FAIN		DATA ELEMENT*	ATTRIBUTED TO
PIID	1*	Awardee Or Recipient Legal Entity Name	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	3*	Ultimate Parent Unique Identifier	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	4*	Ultimate Parent Legal Entity Name	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	5*	Legal Entity Address Legal Entity City Name Legal Entity State Code Legal Entity Zip +4	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	6*	Legal Entity Congressional District	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	15*	Potential Total Value of Award	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	30*	Primary Place of Performance City Name Primary Place of Performance State Code	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	31*	Primary Place of Performance Congressional District	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	33*	Primary Place of Performance Country Name	Treasury’s DATA Act Broker Extracting from FPDS-NG
PIID	36*	Action Type Description Tag	Treasury’s DATA Act Broker Extracting from FPDS-NG
FAIN	3*	Ultimate Parent Unique Identifier	Treasury’s DATA Act Broker Extracting from FABS
FAIN	4*	Ultimate Parent Legal Entity Name	Treasury’s DATA Act Broker Extracting from FABS
FAIN	5*	Legal Entity City Name Legal Entity State Code	Treasury’s DATA Act Broker Extracting from FABS
FAIN	6*	Legal Entity Congressional District	Treasury’s DATA Act Broker Extracting from FABS

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

**File C COVID-19 Outlay Testing and Results**

EXIM did not receive any COVID-19 supplemental relief funding.

**OTHER REPORT CONTENT****Comparative Results of 2021 to 2019 DATA Act Audit Samples by Data Elements Tested**

We compared the weighted projected error rates for the accuracy characteristic, by data element, between the 2021 and 2019 DATA Act audits<sup>13</sup>. EXIM's error rates decreased for 21 data elements, increased for 10 data elements, and stayed the same for 15 data elements that had zero error rates in both years. There were 6 data elements that were not tested in 2019, and 2 data elements that were not tested in either 2021 or 2019, for which the percentage change was not applicable.

Please see Appendix B, *Comparative Results From 2021 and 2019 DATA Act Audits*.

**DATA Act Date Anomaly**

CIGIE identified a timing anomaly with the oversight requirements contained in the DATA Act. That is, the first 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 DAIMS contains additional awardee attribute information that the Treasury DATA Act Broker software extracts from the SAM. File F contains sub-award attribute information the broker software extracts from the FFATA Subaward Reporting System (FSRS). For 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 are not responsible for certifying the quality of File E and F data reported by awardees. They are responsible, however, 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 accuracy, completeness, timeliness, and quality of the data extracted from SAM and FSRS via the Treasury broker software system.

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<sup>13</sup> See *Independent Auditors' Report on EXIM's DATA Act Submission* ([OIG-AR-20-01](#), Nov. 8, 2019).

**Assessment of Internal Control and Compliance with Laws and Regulations**

We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed the effectiveness of EXIM’s activities to address the following internal control components and their underlying principles: risk assessment, control activities, and information and communication. 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.

During our assessment of internal controls and compliance with laws and regulations, we found that EXIM did not comply with OMB Memorandum M-18-16’s requirement that agencies complete a DQP beginning in FY 2019. Please see Finding No. 4 below for information regarding our assessment of EXIM’s internal control procedures related to its completion of a DQP.

We made 12 recommendations, as discussed in the below findings and recommendations regarding internal control. These recommendations, if implemented, should help improve EXIM’s implementation and use of government-wide financial data standards established by OMB and Treasury, as well as the accuracy, completeness, timeliness, and quality of EXIM’s financial and award data submitted for publication on USASpending.gov.

EXIM management concurred with our recommendations and stated that it will take corrective actions in response to our recommendations. Management’s responses to the findings and recommendations are summarized within the report. Please see Appendix C, *Management’s Response* for a complete copy of management’s responses. We did not audit management’s responses, and accordingly, we express no opinion on them.

**Finding 1: EXIM’s Files D1 and D2 Data Were Not Always Accurate, Complete, and Timely**

EXIM’s current internal controls need improvement to help ensure that data contained in Files D1 and D2 are accurate, complete, and timely. We identified control deficiencies related to data input, data verification and validation at the transaction level, review and approvals and data quality monitoring, and data quality certifications. As a result, EXIM did not always accurately, completely, and timely report the data elements in Files D1 and D2.

We selected a stratified, statistically valid random sample of 170 award-level records from Files D1 and D2. As shown earlier in this report, (See Table 1), our sample included 60 records from File D1 and 110 records from File D2. We tested the accuracy and completeness of the data for each data element reported for each sampled record by matching the data to EXIM’s systems of record, source documentation, or other appropriate sources. We tested timeliness of data elements reported for each sampled record by reviewing the Action Date included in the sample data to determine whether loan data was reported no later than 30 days after the award was issued, and non-loan data was reported twice a month; or whether the contract action report (CAR) was completed in FPDS within three business days.

Of the 60 procurement award records sampled from File D1, we found that 46 records contained at least one accuracy or completeness error. In addition, we found that 10 records were not submitted timely.

**Table 7: File D1 Data Accuracy, Completeness, and Timeliness Errors**

Data Element No.*	Data Element	No. of Errors	Condition	Sample Nos.
14	Current Total Value of Award	8	The amounts do not agree to EXIM’s source documentation. The contracting officer (CO) or contract specialist (CS) entered an incorrect amount in FPDS.	4, 19, 25, 30, 44, 45, 51, 56
15*	Potential Total Value of Award	16	The amounts do not agree to EXIM’s source documentation. The CO or CS entered an incorrect amount in FPDS.	4, 11, 12, 15, 19, 25, 26, 30, 39, 44, 45, 49, 51, 53, 54, 56
26	Period of Performance Start Date	3	The date did not agree with the source documentation, either the contract or the statement of work. The CO or CS entered an incorrect date in FPDS.	21, 46, 47
27	Period of Performance Current End Date	10	The date did not agree with the source documentation, either the contract or the statement of work. The CO or CS entered an incorrect date in FPDS.	2, 12, 14, 15, 25, 26, 35, 39, 51, 54
28	Period of Performance Potential End Date	3	The date did not agree with the source documentation, either the contract or the statement of work. The CO or CS entered an incorrect date in FPDS.	8, 14, 35
2	Awardee/Recipient Unique Identifier	5	The data [i.e., the Dun & Bradstreet (DUNS) number] did not agree to the source documentation or systems. <ul style="list-style-type: none"> <li>For 5 records, the DUNS number did not agree to the award documentation (i.e., the contract). The CO or CS entered an incorrect DUNS number in Comprizon.</li> </ul>	12, 16, 30, 36, 45
1*	Awardee/Recipient Legal Entity Name	6	The awardee/recipient legal entity name did not agree to the source documentation or systems. FPDS derives this field using the DUNS number. <ul style="list-style-type: none"> <li>For 6 records, the awardee name did not agree to the award documentation (i.e., contract) or SAM.gov. The CO or CS entered an incorrect DUNS number in Comprizon.</li> </ul>	12, 14, 30, 34, 36, 49

Data Element No.*	Data Element	No. of Errors	Condition	Sample Nos.
			<ul style="list-style-type: none"> <li>For 3 records, we were unable to locate the DUNS number in SAM.gov.</li> </ul>	
3*	Ultimate Parent Unique Identifier	12	<p>The data (i.e., the parent DUNS number) did not match the data in SAM. FPDS derives this field using the “Awardee/Recipient Unique Identifier” (i.e., the DUNS number).</p> <ul style="list-style-type: none"> <li>For 8 records, although the reported DUNS number was correct, the parent DUNS numbers did not match the data in SAM.</li> <li>For 4 records, the DUNS number provided by EXIM was incorrect.</li> </ul>	11, 12, 15, 30, 31, 32, 36, 39, 44, 45, 46, 58
4*	Ultimate Parent Legal Entity Name	10	<p>The data reported in File D1 did not match the data included in SAM. FPDS derives this field using the “Awardee/Recipient Unique Identifier” (i.e., the DUNS number).</p> <ul style="list-style-type: none"> <li>For 7 records, although the reported DUNS number was correct, the Ultimate Parent Legal Entity Name did not match the data in SAM.</li> <li>For 3 of these records, the DUNS number provided by EXIM was incorrect.</li> </ul>	4, 12, 20, 21, 22, 30, 31, 34, 36, 58
5*	Legal Entity Address, City Name, State Code, Zip+4	14	<p>The data did not match EXIM’s source documentation (i.e., the contract or applicable source systems). FPDS derives these fields using the “Awardee/Recipient Unique Identifier” (i.e., the DUNS number).</p> <ul style="list-style-type: none"> <li>For 10 records, one or more components of the address did not agree to the address reported in EXIM’s source documentation, including the street address, city, state code, or zip code.</li> <li>For 8 records, the address or parts of the address did not agree to the address reported in SAM.gov, including the street address, city, state code, or zip code. For 3 of these records,</li> </ul>	1, 4, 10, 12, 15, 16, 17, 27, 30, 34, 35, 36, 40, 45

Data Element No.*	Data Element	No. of Errors	Condition	Sample Nos.
			<p>the DUNS number provided by EXIM was incorrect.</p> <ul style="list-style-type: none"> <li>For 2 records, the last 4 digits of the zip code were not accurate based on the U.S. Postal Service’s zip code look-up tool, located at <a href="https://tools.usps.com">https://tools.usps.com</a>.</li> </ul>	
6*	Legal Entity Congressional District	2	<p>The data reported in File D1 did not match the congressional district based on the zip code and the House of Representative’s Find Your Representative tool, located at <a href="https://www.house.gov/representatives/find-your-representative">https://www.house.gov/representatives/find-your-representative</a>. FPDS derives this field using the “Awardee/Recipient Unique Identifier” (i.e., the DUNS number).</p>	40, 53
30*	Primary Place of Performance City Name, State Code, and Zip+4	4	<p>The data do not match the supporting documentation. The CO or CS entered incorrect data in FPDS, which also caused derived components to be incorrect.</p>	10, 19, 20, 35
31*	Primary Place of Performance Congressional District	2	<p>The data do not match the congressional district utilizing the zip code and the House of Representative’s Find Your Representative tool, located at <a href="https://www.house.gov/representatives/find-your-representative">https://www.house.gov/representatives/find-your-representative</a>.</p>	10, 35
32	Primary Place of Performance Country Code	1	<p>The data do not match the supporting documentation.</p>	20
33*	Primary Place of Performance Country Name	1	<p>The data do not match the supporting documentation. FPDS derives this field using the “Primary Place Of Performance Country Code”</p>	20
16	Contract Award Type and Type of Contract Pricing	3	<p>The data either are not recorded on EXIM’s supporting documentation (1 record) or do not match the supporting documentation (2 records).</p>	14, 25, 32
22	Award Description	13	<p>The description of the award does not provide a brief and easily understandable description of the goods or services EXIM was buying; for award modifications EXIM did not always either</p>	1, 3, 5, 6, 7, 24, 25, 37, 38, 45, 51, 52, 60

Data Element No.*	Data Element	No. of Errors	Condition	Sample Nos.
			restate the brief description of the goods or services or provide an easily understandable description of what the modification was doing. The CO or CS entered an incorrect award description in FPDS.	
36*	Action Type and Action Type Description	2	The action type and action type description are not accurate. The CO or CS entered an incorrect action type, which also caused derived action type description to be incorrect in FPDS.	36, 51
17	NAICS Code	1	The NAICS code is not a valid code and did not exist in the OMB 2017 NAICS Manual. The CO or CS entered an incorrect NAICS code in Comprizon.	9
All	N/A	10	Records were not reported in FPDS-NG within 3 business days of the date the contract was signed.	1, 3, 4, 5, 6, 7, 9, 10, 15, 36

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

Of the 110 financial assistance award records sampled from File D2, we found that 53 records contained at least one accuracy or completeness error. In addition, we found that 91 records were not submitted timely.

**Table 8: File D2 Data Accuracy, Completeness, and Timeliness Errors**

Data Element No.*	Data Element	No. of Errors	Condition	Sample Nos.
11(C)	Original Loan Subsidy Cost	29	The Original Loan Subsidy Cost component of Federal Action Obligation (Data Element [DE] 13) did not match EXIM’s source records in EXIM Online (EOL). <ul style="list-style-type: none"> <li>For 29 records, EXIM reported \$0, which did not match the negative subsidy amount in EOL.</li> </ul>	68, 71, 78, 81, 83, 85, 88, 90, 93, 95, 97, 106, 116, 117, 120, 121, 123, 125, 127, 132, 135, 138, 151, 153, 154, 160, 161, 167, 170
25	Action Date	4	The Action Date did not match EXIM’s source records in EOL.	120, 130, 154, 160
2	Awardee Or Recipient Unique Identifier	2	The Awardee Or Recipient Unique Identifier (i.e., DUNS number) was incomplete because it was not populated.	147, 162
1*	Awardee Or Recipient Legal Entity Name	3	The Awardee Or Recipient Legal Entity Name did not match SAM.gov.	146, 163, 164
3*	Ultimate Parent Unique Identifier	1	The Ultimate Parent Unique Identifier (i.e., Parent DUNS	69

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element No.*	Data Element	No. of Errors	Condition	Sample Nos.
			number) was expired in SAM.gov. This field is not reported by EXIM, but rather is derived from FABS based on the DUNS number (DE 2), which is reported by EXIM.	
4*	Ultimate Parent Legal Entity Name	4	<p>The Ultimate Parent Legal Entity Name had a parent DUNS that was expired in SAM.gov, or was inaccurate because it was incomplete. This field is not reported by EXIM, but rather is derived from FABS based on the DUNS number (DE 2), which is reported by EXIM.</p> <ul style="list-style-type: none"> <li>• For 1 record, the associated unique identifier was expired in SAM.gov.</li> <li>• For 3 records, the Ultimate Parent Legal Entity Name was not populated, and was thus incomplete.</li> </ul>	69, 114, 117, 127
5*	Legal Entity Address	21	<p>The Legal Entity Address did not match EXIM's source records in EOL or did not match SAM.gov or USPS.gov. Components of this data element, "Legal Entity City Name" (DE 5(C)(i)) and "Legal Entity State Code" (DE 5(D)), are not extracted from the EXIM FABS submission but are instead derived from FABS using Legal Entity Zip Last 4.</p> <ul style="list-style-type: none"> <li>• For 6 records, one or more components of the address did not match the record in EOL.</li> <li>• For 16 records, one or more components of the address did not match the record in SAM.gov. This includes 1 record that also did not match the record in EOL and is included in the count listed above.</li> <li>• For 4 records, one or more components of the address did not agree to the record in USPS.gov. Each of these records was also included in the counts listed above. <ul style="list-style-type: none"> <li>○ For 3 of the 4 records, the Legal Entity City Name (DE 5(C)(i)) did not match USPS.gov.</li> <li>○ For 1 of the 4 records, the Legal Entity Zip Last 4 (DE</li> </ul> </li> </ul>	61, 67, 86, 91, 92, 93, 97, 99, 101, 102, 107, 111, 116, 119, 138, 139, 144, 146, 148, 164, 166

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element No.*	Data Element	No. of Errors	Condition	Sample Nos.
			5(E)(ii) did not match USPS.gov.	
6*	Legal Entity Congressional District	3	The Legal Entity Congressional District did not match the congressional district utilizing the zip code and the following website, <a href="https://www.house.gov">https://www.house.gov</a> . This data element is not extracted from the EXIM FABS submission but is instead derived by the Data Broker.	88, 94, 139
2 and 4*	Awardee Or Recipient Unique Identifier  Ultimate Parent Legal Entity Name	5	Records included at least one incomplete data element. <ul style="list-style-type: none"> <li>For 2 records, the “Awardee Or Recipient Unique Identifier” was not populated.</li> <li>For 3 records, the “Ultimate Parent Legal Entity Name” was not populated, despite having an Ultimate Parent Unique Identifier in the record.</li> </ul>	114, 117, 127, 147, 162
All	N/A	91	Records were not reported timely. A record was timely if it was reported no later than 30 days after the award was issued for loan data or twice per month for non-loan data.	61, 63, 64, 65, 66, 68, 69, 70, 71, 73, 74, 75, 76, 77, 78, 79, 80, 82, 83, 84, 85, 87, 88, 89, 90, 91, 94, 95, 96, 98, 99, 100, 101, 103, 104, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 123, 125, 126, 127, 128, 129, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 156, 157, 158, 159, 160, 161, 162, 164, 165, 166, 168, 169, 170

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

OMB Management Procedures Memorandum No. 2016-03, *Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information*, dated May 3, 2016, states:

*On a quarterly basis, agency Senior Accountable Officials must provide reasonable assurance that their internal controls support the reliability and validity of the agency account-level and award-level data they submit to Treasury for publication on USASpending.gov.*

GAO's *Standards for Internal Control in the Federal Government* (GAO-14-704G), Section 4 – *Additional Considerations*, paragraph OV4.05, states:

*A smaller entity, however, faces greater challenges in segregating duties because of its concentration of responsibilities and authorities in the organizational structure. Management, however, can respond to this increased risk through the design of the internal control system, such as by adding additional levels of review for key operational processes, reviewing randomly selected transactions and their supporting documentation, taking periodic asset counts, or checking supervisor reconciliations.*

GAO-14-704G, *Principle 10 – Design Control Activities*, paragraph 10.03, states:

*Management designs appropriate types of control activities for the entity's internal control system. Control activities help management fulfill responsibilities and address identified risk responses in the internal control system.... Management clearly documents internal control and all transactions and other significant events in a manner that allows the documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals, in either paper or electronic form. Documentation and records are properly managed and maintained.*

FAR Part 4.604 (b)(2) states:

*The CAR must be confirmed for accuracy by the contracting officer prior to release of the contract award. The CAR must then be completed in FPDS within three business days after contract award." FAR Part 4.604 (b)(3) states: "For any action awarded in accordance with FAR 6.302-2 or pursuant to any of the authorities listed at subpart 18.2, the CAR must be completed in FPDS within 30 days after contract award.*

OMB Management Procedures Memorandum No. 2016-03 states:

*By March 31, 2017, for all new or modified financial assistance awards, Federal agencies must ensure that the official entity information, specifically the legal business name and the physical address, are identical to SAM at the time of the award and award's modification. Federal agencies shall ensure that proper internal controls are in place to assure alignment of SAM data with information in their internal management systems.(21)*

Footnote 21 to the previous quote states:

*Agencies may store other entity information in their award management systems, however, they must ensure that the values for legal business name and physical*

*address match exactly (including case) at the time of the award and at the time of any award modification, and that this data is what is submitted to USASpending.gov for financial assistance awards.*

OMB DATA Act AGENCY FAQs [11-4-2016] states:

*... Where a loan or loan guarantee is zero subsidy or negative subsidy, agencies should report the net present value of the subsidy as zero or as a negative value in the Original Subsidy Cost field on File D2.*

DATA Act Information Model Schema (DAIMS) Validation Rules Version 2.0.2, Rule FABS 29.1 states:

*OriginalLoanSubsidyCost is required for loans (AssistanceType = 07 or 08).*

DAIMS Practices and Procedures for DATA Act Broker Submissions Version 2.1, Financial Assistance Broker Submission (FABS), states:

*Timeliness –To ensure the timeliness of available data, FFATA set a baseline requirement that financial assistance spending data must be reported to and posted on USASpending no later than 30 days after an award is issued. OMB M-20-21 strengthened this requirement for non-loans: now, agencies must report all issued-but-yet-to-be-reported non-loan assistance data twice a month (and space the reporting roughly two weeks apart.*

We identified several causes that may have contributed to EXIM's errors with regard to data accuracy and completeness.

- Not all required award-level data is automatically fed from Comprizon to FPDS. Accordingly, EXIM's COs and CSs must manually input certain award-level data in FPDS. We found that although EXIM has developed, documented, and implemented formal procedures to help ensure all COs and CSs are entering information in FPDS consistently, there are still errors occurring. COs and CSs sometimes use different source information to populate the same data elements in FPDS, including the Award Description, Period of Performance Current End Date, Period of Performance Potential End Date, Current Total Value of Award, Potential Total Value of Award, and the Primary Place of Performance. COs and CSs also have made clerical errors when entering information in FPDS.
- Because the data reported in FPDS is the source of File D1, the SAO relied solely on controls over EXIM's process to enter data into FPDS when certifying File D1 in its second quarter FY 2021 DATA Act submission.
- EXIM reviews each CAR prepared by the CO to identify anything that is incorrect. When an item is identified as incorrect, EXIM will make the correction, which updates the Approved Date shown on FPDS. Although the CAR is completed timely in FPDS by the CO, the overall review and confirmation of accuracy of the CAR is not always completed within 3 business days, causing timeliness errors.

- EXIM made a decision to report zero-dollars as “Original Loan Subsidy Cost” for its insurance program transactions because it believed this field was not applicable for the insurance program, based on DAIMS guidance that states this field is only required for loans. However, EXIM accounts for its insurance program under the provisions of the Federal Credit Reform Act of 1990 (FCRA) and began correctly reporting insurance program transactions as Assistance Type 08, “guaranteed/insured loan (F)”.
- Because the data reported in FABS is the source of File D2, the SAO relied solely on controls over EXIM’s process to enter data into FABS when certifying File D2 in its FY 2021, Quarter 2 DATA Act submission. The Data Broker is responsible for extracting File D2 from data submitted by EXIM into FABS, and deriving certain data elements. The SAO did not have a process to identify errors in data elements derived by the Data Broker so that they could be prevented or detected and brought to the attention of Treasury as appropriate.
- EXIM follows an internal policy in which FABS financial information is not released publicly until the month-end general ledger (GL) has been closed. Monthly data is not available until the accounting period has been fully closed by the Chief Financial Officer (CFO), generally around the 15th of the following month. Depending on workload and available resources, it may take 1-2 weeks to review and process any necessary data corrections prior to submission to the Data Broker.

File D1 of EXIM’s second quarter FY 2021 DATA Act submission was not always accurate and timely, reducing the overall quality and reliability of the data for improving transparency in federal spending. In addition, without an effective process to review FPDS and File D1 prior to the submission and certification of the DATA Act files, errors caused by incorrect data entry into Comprizon or FPDS have occurred without detection by the SAO or the Office of Resource Management, Acquisition/Business Services Division. As a result, EXIM was not able to communicate those errors to FPDS administrators, SAM, or Treasury.

Differences between amounts reported in File D1 and amounts in EXIM’s source documentation for the following dollar value data elements are:

- The absolute value for the 8 differences noted for data element 14A “CurrentTotalValueOfAward” totaled \$2,911,000.
- The absolute value for the 16 differences noted for data element 15 “PotentialTotalValueOfAward” totaled \$18,772,759.

File D2 of EXIM’s second quarter of FY 2021 DATA Act submission was not accurate, complete, and timely, reducing the overall quality and reliability of the data for improving transparency in federal spending. In addition, until EXIM designs and implements effective controls over its File D2 data, including effective procedures for identifying and communicating potential Data Broker errors to Treasury, EXIM has an increased risk that its future File D2 submissions will not be accurate, complete, or timely.

The absolute value of the 29 differences noted between the amounts reported in File D2 and amounts reported in EXIM’s source systems for the dollar value data element 11C, “Original Loan Subsidy Cost” totaled \$174,859.

### **Recommendations, Management’s Response, and Evaluation of Management’s Response**

#### **Recommendations:**

We recommend that the SAO and EXIM’s DATA Act Working Group:

1. Determine the root cause of the errors in EXIM-provided data identified during the testing of the second quarter FY 2021 Files D1 and D2, and take necessary corrective action to: (a) correct the errors for records shown in USASpending.gov; (b) identify the risk of reporting incorrect data for each data element containing the error; and (c) update the policies and procedures for recording data in Comprizon, FPDS, and FABS to address the risks and include adequate verification and validation review processes performed by the data owner and a supervisor or other independent party.
2. Continue to improve the design of its review of the procurement award data in FPDS and financial assistance award data submissions to FABS by identifying the root cause for the exceptions in those data elements for which EXIM is responsible, and by developing more effective review procedures for those data elements, as well as the data elements that the SAO and DATA Act Working Group identify as having a high risk of not being accurate, complete, or reported timely.
3. Review EXIM’s policies and procedures for submitting contract award data in FPDS, including procedures for reviewing and confirming the accuracy of the CAR, to ensure proper design and compliance with FAR guidelines for timeliness. Update the policies and procedures based on this review, as necessary, to ensure EXIM meets FAR timeliness guidelines.
4. Review EXIM’s policies and procedures that address timelines for submitting complete and accurate FABS files containing financial assistance award data, to ensure proper design and compliance with DAIMS guidance. Update the policies and procedures based on this review, as necessary, to ensure EXIM meets DAIMS timeliness guidelines.

#### **Management’s Response**

Management agrees with the recommendations and provided the following responses:

Recommendation 1: EXIM will determine the root cause of the errors in identified EXIM-provided data, and take necessary corrective action to (a) correct the errors for records shown in USASpending.gov, (b) identify the risk of reporting incorrect data for each data element containing the error, and (c) update the policies and procedures for recording data in Comprizon, FPDS, and FABS to address the risks, and to include adequate verification and validation review processes performed by the data owner and a supervisor or other independent party.

Recommendation 2: EXIM will continue to improve the design of its review of the procurement award data in FPDS and financial assistance award data submissions to FABS, by identifying the root cause for the exceptions in those data elements for which EXIM is responsible, and by developing more effective review procedures for those data elements, as well as the data elements that the SAO and DATA Act Working Group identify as having a high risk of not being accurate, complete, or reported timely.

Recommendation 3: Management agrees with the recommendation. To ensure proper design and compliance with FAR guidelines for timeliness, EXIM will review the Bank's policies and procedures for submitting contract award data in FPDS, including procedures for reviewing and confirming the accuracy of the CAR.

Recommendation 4: Management agrees with the recommendation. To ensure EXIM meets DAIMs design, compliance, and timeliness guidelines, EXIM will review and update as necessary the Bank's policies and procedures that address timelines for submitting complete and accurate FABS files containing financial assistance award data.

### **Independent Auditors' Evaluation of Management's Response**

EXIM's proposed corrective actions are responsive to the recommendations. The recommendations will be closed upon completion and verification of the corrective actions.

## **Finding 2: EXIM Did Not Implement the Data Standards as Defined for Certain Data Elements**

EXIM did not implement the data standards as defined by OMB and Treasury for certain data elements reported in Files D1 and D2. Specifically, we noted the following during our testing of a statistical sample of records included in Files D1 and D2.

### **File D1**

- EXIM did not always provide an easily understandable description of the goods or services EXIM was buying in the "Award Description" for new contract awards. In addition, for modifications, EXIM did not always either restate the brief description of the goods or services or provide an easily understandable description of what the modification was doing. For example, in one instance EXIM described the award transaction as "ILS BPA" instead of describing the nature of the goods or services being procured.

### **File D2**

- EXIM did not report its negative subsidy amounts in "Original Loan Subsidy Cost" for its insurance program transactions, even though: (a) EXIM accounts for its insurance program under the provisions of the FCRA, and (b) EXIM correctly began reporting these transactions as Assistance Type 08, "guaranteed/insured loan (F)" in response to a 2019 DATA Act audit<sup>14</sup> recommendation, which requires reporting of the "Original Loan Subsidy Cost".

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<sup>14</sup> Supra note 13.

DAIMS IDD v2.0, Interface Content Detailed Inventory – File D1 Award (Procurement) provides the definition for data element labeled *AwardDescription* as:

*A brief description of the purpose of the award.*

OMB M-18-16, Appendix A to OMB Circular No. A-123, *Management of Reporting and Data Integrity Risk*, New Requirement for a Data Quality Plan section, states the following regarding award descriptions:

*...including specific data the agency determines to be high-risk that are explicitly referenced by the DATA Act, confirmation that these data are linked through the inclusion of the award identifier in the agency's financial system, and reported with plain English award descriptions....*

The General Services Administration (GSA), FPDS Data Element Dictionary, Version 1.5, states:

*For the initial base award, enter a brief description of the goods or services you are buying or for an Indefinite Delivery Vehicle, a brief description of the goods or services available. For modifications, either re-state the brief description of the goods or services or describe what the modification is doing. The description field may also contain additional information. It may not contain PII. This is a summary level field and it is not expected to restate the exact information from an award or modification.*

DAIMS Validation Rules v2.0.2, Rule FABS29.1, states:

*Original Loan Subsidy Cost is required for loans (AssistanceType = 07 or 08).*

OMB and Treasury document titled *Agency FAQs [11-4-2016] - Digital Accountability and Transparency Act of 2014*, states:

*...where a loan or loan guarantee is zero subsidy or negative subsidy, agencies should report the net present value of the subsidy as zero or as a negative value in the Original Subsidy Cost field on File D2.*

As noted in GAO report GAO-20-75, *DATA ACT Quality of Data Submissions Has Improved but Further Action Is Needed to Disclose Known Data Limitations*, additional guidance is needed to clarify how agencies are to report spending data using standardized data element definitions that may be open to more than one interpretation, and then broadly communicate this information to agencies and the public. In particular, the GAO report cited the “Award Description” data element as one data element throughout the government that was significantly inconsistent with the established standard for reporting the data element.

EXIM began correctly reporting its insurance transactions using Assistance Type 08, in response to a 2019 DATA Act Audit finding and recommendation.<sup>15</sup> When EXIM began

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<sup>15</sup> *Supra* note 13.

using Assistance Type 08, it did not realize that it should have started reporting negative subsidy for its insurance program.

Noncompliance with the DATA Act Standards diminishes the usefulness, and comparability of Federal spending data, and introduces risks associated with relying on the data for oversight and managerial decision-making, or other purposes.

### **Recommendations, Management’s Response, and Evaluation of Management’s Response**

#### **Recommendations:**

We recommend that the SAO and EXIM’s DATA Act Working Group:

5. Complete a data inventory for File D1 that defines each data element based on government-wide financial data standards, and that EXIM seeks clarification from OMB and Treasury, as necessary, in order to ensure appropriate interpretation of the DATA Act Standards.
6. Establish policies and procedures to help ensure that all data reported in FABS and included in EXIM’s certified File D2 are reported as intended by the Data Act Standards, and that EXIM seek clarification from OMB and Treasury, if necessary, in order to ensure appropriate interpretation of the Data Act Standards.

#### **Management’s Response**

Management agrees with the recommendations and provided the following responses:

Recommendation 5: EXIM will complete a data inventory for File D1 that defines each data element based on government-wide financial data standards, and seeks clarification from OMB and Treasury, as necessary, in order to ensure appropriate interpretation of the DATA Act Standards.

Recommendation 6: EXIM will establish policies and procedures to help ensure that all data reported in FABS and included in EXIM’s certified File D2 are reported as intended by the Data Act Standards, and that EXIM seek clarification from OMB and Treasury, if necessary, in order to ensure appropriate interpretation of the Data Act Standards.

#### **Independent Auditors’ Evaluation of Management’s Response**

EXIM’s proposed corrective actions are responsive to the recommendations. The recommendations will be closed upon completion and verification of the corrective actions.

### **Finding 3: EXIM Does Not Have a Complete Data Inventory to Govern Its DATA Act Activities**

EXIM does not have a complete data inventory to govern its DATA Act activities. EXIM did prepare and provide a File D2 data inventory, which contained all currently required File D2 data elements, identified appropriate source systems, and contained data element names and definitions consistent with OMB and Treasury definitions. EXIM, however, has not completed similar data dictionaries for Files A through D1.

The DATA Act Program Management Office in the Treasury’s Bureau of the Fiscal Service has prepared a DATA Act Implementation Playbook Version 2.0, which contains an eight-step DATA Act implementation plan for agencies. Step 3: Perform Inventory of Agency Data and Associated Business Processes states:

*After reviewing the DATA Act elements in step 2, the SAO and agency workgroup will perform and create an inventory of agency data and associated business processes. The SAO and workgroup will need to trace how DATA Act elements are used across agency business processes, systems and applications. The goal is to identify the appropriate source system to extract the needed data and understand gaps (e.g., data not captured or data that is difficult to extract). The workgroup will inventory how its elements, sources, and processes fit/link together.*

EXIM did not develop and implement a corrective action plan to address the finding and recommendations related to the data inventory that were identified during the 2019 DATA Act audit.<sup>16</sup> EXIM had previously indicated that the data inventory was scheduled for completion in FY 2020, but this was not accomplished in part due to changes in personnel.

The lack of a complete DATA inventory increases the risk of having accuracy and completeness errors that affect the overall quality of the data recorded in USASpending.gov.

### **Recommendations, Management’s Response, and Evaluation of Management’s Response**

#### **Recommendations:**

We recommend that the SAO and EXIM’s DATA Act Working Group:

7. Complete a data inventory for each of Files A through D1 to govern EXIM’s DATA Act activities and help ensure compliance with government-wide financial data standards.
8. Develop and document a review process of the data inventories for Files A through D2 that EXIM will perform at regular intervals and after each DAIMS update.

#### **Management’s Response**

Management agrees with the recommendations and provided the following responses:

Recommendation 7: To govern its DATA Act activities and help ensure compliance with government-wide financial data standards, EXIM will complete a data inventory for each of Files A through D1.

Recommendation 8: EXIM will develop and document a review process of the data inventories for Files A through D2 that EXIM will perform at regular intervals and after each DAIMS update.

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<sup>16</sup> *Supra* note 13.

**Independent Auditors' Evaluation of Management's Response**

EXIM's proposed corrective actions are responsive to the recommendations. The recommendations will be closed upon completion and verification of the corrective actions.

**Finding 4: EXIM Did Not Complete a Data Quality Plan in a Timely Manner**

EXIM has not yet completed its DQP, which was required beginning in FY 2019. Although EXIM began preparing a DQP in FY 2019, development was not far along enough for EXIM to implement, test, and evaluate the DQP. Subsequent to FY 2019, EXIM updated parts of its DQP. However, the changes did not fully address the condition or recommendation noted in the 2019 Data Act audit.<sup>17</sup>

Although our testing showed that EXIM's DQP included an extensive risk assessment in its Data Act Implementation Risk Register (last updated in 2019), EXIM's DQP remains incomplete. We noted that the DQP:

- Included only a partial organization structure; it did not identify the roles for each member (the data owners, reviewers, approvers and certifier). The DQP also included user groups that were not defined;
- Identified that a risk profile was developed, but did not include the process by which EXIM identifies and assesses risk related to spending data;
- Did not include a testing plan; and
- Lacked details about some key internal control activities over financial and award data reporting. For instance, the plan omitted detailed reconciliation procedures such as a reconciliation of Files A and B, a reconciliation of Files B and C, and a reconciliation of Files A and B to the adjusted trial balance.

OMB Memorandum M-18-16, Appendix A to OMB Circular No. A-123, *Management of Reporting and Data Integrity Risk* (Jun. 6, 2018), states:

*This memorandum includes a specific requirement for agencies to develop a Data Quality Plan to achieve the objectives of the Digital Accountability and Transparency Act (DATA Act).*

*Consideration of this plan must be included in agencies' existing annual assurance statement over ICOR beginning in fiscal year 2019 and continuing through the statement covering fiscal year 2021 at a minimum, or until agencies determine that they can provide reasonable assurances over the data quality controls that support achievement of the reporting objective in accordance with the DATA Act.*

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<sup>17</sup> *Supra* note 13.

OMB Memorandum M-16-17, OMB Circular No. A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control* (Jul. 15, 2016), states:

*The assurance statement and summary information related to Section 2 and Section 4 of the FMFIA must be provided in a single report section of the annual AFR, PAR, or other management report labeled "Analysis of Entity's Systems, Controls and Legal Compliance." The section must include the annual assurance statement, a summary of the Agency's process for assessing internal control effectiveness and resulting material weaknesses and corrective action plans as of September 30 of a given fiscal year.*

EXIM did not develop and implement a corrective action plan to address the finding and recommendations related the DQP that were identified during the 2019 DATA Act audit.<sup>18</sup> EXIM had scheduled completion of its DQP for FY 2020, but this was not accomplished in part due to changes in personnel.

Noncompliance with this requirement increases the risk that data reported under the DATA Act will be less accurate, incomplete, not timely, and of less quality. In addition, because its DQP is incomplete, EXIM will not be able to consider all elements of a complete DQP when preparing its annual assurance statement in compliance with OMB Memorandum M-18-16.

### **Recommendations, Management's Response, and Evaluation of Management's Response**

#### **Recommendation:**

We recommend that the SAO and EXIM's DATA Act Working Group:

9. Develop, test, and implement a DQP that covers significant milestones and major decisions pertaining to:
  - Organizational structure and key processes providing internal control activities for spending reporting;
  - Management's responsibility to supply quality data to meet the reporting objectives for the DATA Act in accordance with OMB Circular No. A-123;
  - EXIM's testing plan and identification of high-risk reported data, including: (1) specific data the agency determines to be high-risk that are explicitly referenced by the DATA Act; and (2) confirmation that these data are linked through the inclusion of the award identifier in the agency's financial system, and reported with plain English award descriptions; and
  - Actions taken to manage identified risks.

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<sup>18</sup> *Supra* note 13.

**Management’s Response**

Management agrees with the recommendation and provided the following response:

Recommendation 9: EXIM will develop, test, and implement a DQP that covers significant milestones and major decisions pertaining to the aspects listed in the recommendation above.

**Independent Auditors’ Evaluation of Management’s Response**

EXIM’s proposed corrective actions are responsive to the recommendation. The recommendation will be closed upon completion and verification of the corrective actions.

**Finding 5: EXIM’s Required Data Were Not Always Completely Reported**

EXIM did not always report an appropriate object class code in its second quarter of FY 2021 DATA Act File B, *Object Class and Program Activity* (File B), resulting in incomplete reporting of spending data. During both the 2017 and 2019 DATA Act audits,<sup>19</sup> we determined that EXIM did not always report valid object class codes and program activity codes. EXIM made progress since FY 2019 by (1) reporting only valid program activity codes and (2) reducing the overall number of transactions containing an object class of “000” in its second quarter of FY 2021 DATA Act submission. However, the condition related to object class codes remains.

Specifically, we noted that 15 of 216 transactions reported in File B had an object class of “000,” which is not listed in OMB Circular No. A-11, *Preparation, Submission, and Execution of the Budget*, § 83, Object Classification (Max Schedule O) and is not a valid object class.

The Federal Spending Transparency Data Standards established by OMB and Treasury define object classes as:

*Categories in a classification system that presents obligations by the items or services purchased by the Federal Government. Each specific object class is defined in OMB Circular A-11 § 83.6.*

OMB Circular No. A-11 § 83.2 states,

*You must report object class information because the law (31 U.S.C. 1104(b)) requires the President’s Budget to present obligations by object class for each account.*

GAO’s *Standards for Internal Control in the Federal Government* (GAO-14-704G), *Principle 17 – Evaluate Issues and Remediate Deficiencies*, paragraph 17.06, states:

*Management completes and documents corrective actions to remediate internal control deficiencies on a timely basis. These corrective actions include resolution of audit findings. Depending on the nature of the deficiency, either the oversight body or*

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<sup>19</sup> *Supra* note 13.

*management oversees the prompt remediation of deficiencies by communicating the corrective actions to the appropriate level of the organizational structure and delegating authority for completing corrective actions to appropriate personnel. The audit resolution process begins when audit or other review results are reported to management, and is completed only after action has been taken that (1) corrects identified deficiencies, (2) produces improvements, or (3) demonstrates that the findings and recommendations do not warrant management action. Management, with oversight from the oversight body, monitors the status of remediation efforts so that they are completed on a timely basis.*

In the SAO's Memo to File "Warnings for 2021 Q2 DATA Act reporting," the SAO acknowledged that the invalid object classes reported in File B are due to older records that were recorded in its financial system of record, FMS-NG, without an object class code. The SAO did not view the error as materially affecting the accuracy of the data being reported.

As of the FY 2021 DATA Act Audit, EXIM management has not fully implemented corrective actions to resolve invalid object class usage in older transactions. In addition, they have not considered designing and implementing a temporary process to manually adjust transactions in File B so that File B includes all required object classes.

Data that does not contain valid object class codes does not convey useful information about the type of items or services purchased. The 15 transactions with missing object classes account for:

- \$1.1 million of the \$110.1 million of the Current Period Ending Undelivered Orders reported; and
- \$-0.5 million of the \$62.1 million of the Current Period Delivered Orders reported.

### **Recommendations, Management's Response, and Evaluation of Management's Response**

#### **Recommendation:**

We recommend that the SAO in coordination with the OCFO:

10. Continue to implement its corrective action plan to ensure that object class codes are accurately and completely reported in all financial and award data submissions (Files B and C).

**Management’s Response**

Management agrees with the recommendation and provided the following response:

Recommendation 10: EXIM will continue to implement its corrective action plan to ensure that object class codes are accurately and completely reported in all financial and award data submissions (Files B and C).

**Independent Auditors’ Evaluation of Management’s Response**

EXIM’s proposed corrective actions are responsive to the recommendation. The recommendation will be closed upon completion and verification of the corrective actions.

**Finding 6: EXIM Did Not Fully Document File A Reconciling Differences**

EXIM made significant progress in remediating the 2019 Data Act audit finding that EXIM had not prepared timely and accurate File A, File B, and File C reconciliations and had not appropriately designed the reconciliations.<sup>20</sup> We noted, however, that these process improvements did not result in a full resolution of the condition noted in FY 2019.

In its second quarter of FY 2021 reconciliation between File A and the trial balance, EXIM did not present a reconciling difference in its reconciliation documentation. EXIM did not include the trial balance amount in GL account 405000.01.01 (Anticipated Reductions to Appropriations by Offsetting Collections or Receipts-Adm) in its comparison of File A data elements to the trial balance amounts comprising each data element. This resulted in the lack of appropriate documentation explaining the nature and cause of differences between File A and the trial balance, as well as management’s decision regarding the accuracy of File A. Nor did EXIM document in the reconciliation the reason for excluding the account balance.

GAO’s *Standards for Internal Control in the Federal Government, Principle 13- Use Quality Information*, paragraph 13.05 (Sep. 2014), states:

*Management processes the obtained data into quality information that supports the internal control system. This involves processing data into information and then evaluating the processed information so that it is quality information. Quality information meets the identified information requirements when relevant data from reliable sources are used. Quality information is appropriate, current, complete, accurate, accessible, and provided on a timely basis. Management considers these characteristics as well as the information processing objectives in evaluating processed information and makes revisions when necessary so that the information is quality information. Management uses the quality information to make informed decisions and evaluate the entity’s performance in achieving key objectives and addressing risks.*

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<sup>20</sup> *Supra* note 13.

In March 2021, EXIM posted an entry to record anticipated offsetting collections for FY 2021, but failed to post the related \$110 million anticipated reduction to appropriations received. This error was not discovered by EXIM personnel until after GTAS was submitted. Therefore, the entry was not included on the SF-133, which is derived from the GTAS submission. EXIM, however, did record the entry in its trial balance after GTAS was submitted. Because the DATA Act submission should be consistent with the SF-133, EXIM did not include the \$110 million in File A.

When EXIM performed the File A reconciliation to the trial balance, EXIM did not include GL Account 405000.01.01 in the trial balance amounts used to reconcile to File A, because EXIM realized that changing File A to agree with the trial balance would then create a difference between File A and the SF-133.

Although EXIM’s File A agreed to EXIM’s SF-133, File A was overstated by \$110 million due to the timing difference created by the accounting error, as shown in Table 9.

**Table 9: File A Errors**

<b>File A Column Heading</b>	<b>Amount of Error</b>	<b>Over-Understatement</b>
Total Budgetary Resources - CPE	\$110 Million	Overstatement
Budget Authority Appropriated Amount - CPE	\$110 Million	Overstatement
Status of Budgetary Resources Total - CPE	\$110 Million	Overstatement
Unobligated Balance - CPE	\$110 Million	Overstatement

In addition, not including all appropriate GL account balances in the reconciliation increases the risks that EXIM would not identify File A errors timely, and that management would not become aware of errors and/or timing differences when certifying the DATA Act submissions.

**Recommendations, Management’s Response, and Evaluation of Management’s Response**

**Recommendations:**

We recommend that the SAO in coordination with the OCFO:

11. Design and implement a reconciliation mapping process that includes all GL accounts that comprise each File-A data element, and use it consistently for each reconciliation; and
12. Ensure that it fully documents the nature, cause, and resolution of variances that exist in the reconciliations.

**Management’s Response**

Management agrees with the recommendations and provided the following responses:

Recommendation 11: EXIM will design and implement a reconciliation mapping process that includes all GL accounts that comprise each File-A data element, and use it consistently for each reconciliation.

Recommendation 12: EXIM will update processes to include fully documenting the nature, cause, and resolution of variances that exist in the reconciliations.

### **Independent Auditors’ Evaluation of Management’s Response**

EXIM’s proposed corrective actions are responsive to the recommendations. The recommendations will be closed upon completion and verification of the corrective actions.

## **CONCLUSION**

EXIM’s processes for implementing and complying with the DATA Act requirements have continued to improve since the 2019 DATA Act audit; however, these processes are still maturing. We determined that EXIM submitted and certified its second quarter of FY 2021 DATA Act files on time. However, EXIM did not always report an appropriate object class in its File B submission, resulting in incomplete reporting of spending data. We also found that EXIM did not fully document reconciling differences in its File A reconciliation documentation, and we determined that EXIM’s procurement and financial assistance award data were not always accurate, complete, and timely. Based on the results of our statistical and non-statistical testing for EXIM’s second quarter of FY 2021 DATA Act submission, we assessed the quality of EXIM’s data to be of higher quality, which was the same assessment as in the 2019 DATA Act audit.<sup>21</sup> We also determined that EXIM is not using certain data standards as intended by the DATA Act Working Group, has not yet completed its DQP, and does not yet have a complete data inventory.

EXIM continues to have opportunities to improve the overall quality of its quarterly procurement and financial assistance award data, to strengthen its internal control processes and procedures to ensure compliance with the DATA Act standards and requirements, and to complete its DQP. We made 12 recommendations, as discussed in the findings and recommendations in this report. These recommendations, if implemented, should help improve EXIM’s implementation and use of government-wide financial data standards established by OMB and Treasury, as well as the accuracy, completeness, timeliness, and quality of EXIM’s financial and award data submitted for publication on USASpending.gov.

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<sup>21</sup> *Supra* note 13.

**APPENDIXES**

**Appendix A: Sample Testing Results with Related Statistical Projections**

**Table 10: Data Elements Tested, Errors, Projected Error Rates, and Lower- and Upper-Limit Error Rates Accuracy Characteristic**

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>22</sup>			Errors <sup>23</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
1*	Awardee/ Recipient Legal Entity Name	Accuracy	97	643	740	60	110	170	6	3	9	10.00%	2.73%	3.68%	1.92%	7.75%
2	Awardee/ Recipient Unique Identifier	Accuracy	97	643	740	60	110	170	5	2	7	8.33%	1.82%	2.67%	1.29%	6.31%
3*	Ultimate Parent Unique Identifier	Accuracy	97	643	740	60	21	81	12	1	13	20.00%	4.76%	6.76%	2.70%	23.06%
4*	Ultimate Parent Legal Entity Name	Accuracy	97	643	740	60	24	84	10	4	14	16.67%	16.67%	16.67%	6.49%	34.37%
5*	Legal Entity Address	Accuracy	97	643	740	60	110	170	14	21	35	23.33%	19.09%	19.65%	14.23%	26.52%

<sup>22</sup> EXIM did not always report optional data elements and not all data elements were applicable to every record tested. We calculated the sample size for each data element based on the number of records to which the data element applied. If we determined that a data element did not apply for a record, we excluded that record from the sample count. We therefore computed the error rates using the number of errors identified divided by the number of records to which the data element applied and could be tested.

<sup>23</sup> Errors are presented by data element, not by record. One record may contain multiple data elements with errors.

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>22</sup>			Errors <sup>23</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
6*	Legal Entity Congressional District	Accuracy	97	643	740	45	107	152	2	3	5	4.44%	2.80%	3.02%	1.23%	7.21%
7*	Legal Entity Country Code	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
8*	Legal Entity Country Name	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
11*	Amount of Award	Accuracy	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
12	Non-Federal Funding Amount	Accuracy	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
13	Federal Action Obligation	Accuracy	97	643	740	60	110	170	0	29	29	0.00%	26.36%	22.91%	16.62%	30.14%
14	Current Total Value of Award	Accuracy	97	n/a	97	48	n/a	48	8	n/a	8	16.67%	n/a	16.67%	10.31%	25.77%
15*	Potential Total Value of Award	Accuracy	97	n/a	97	60	n/a	60	16	n/a	16	26.67%	n/a	26.67%	20.62%	34.02%
16*	Award Type	Accuracy	97	643	740	60	110	170	3	0	3	5.00%	0.00%	0.66%	0.41%	1.36%
17	NAICS Code	Accuracy	97	n/a	97	60	n/a	60	1	n/a	1	1.67%	n/a	1.67%	1.03%	6.20%
18*	NAICS Description	Accuracy	97	n/a	97	60	n/a	60	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
19	CFDA Number	Accuracy	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
20*	CFDA Title	Accuracy	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
22	Award Description	Accuracy	97	643	740	60	110	170	13	0	13	21.67%	0.00%	2.84%	2.03%	3.78%
23	Award Modification/Amendment Number	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
24	Parent Award ID Number	Accuracy	97	n/a	97	35	n/a	35	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
25	Action Date	Accuracy	97	643	740	60	110	170	0	4	4	0.00%	3.64%	3.16%	1.08%	7.43%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>22</sup>			Errors <sup>23</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
26	Period of Performance Start Date	Accuracy	97	n/a	97	60	n/a	60	3	n/a	3	5.00%	n/a	5.00%	3.09%	10.31%
27	Period of Performance Current End Date	Accuracy	97	n/a	97	48	n/a	48	10	n/a	10	20.83%	n/a	20.83%	13.41%	30.93%
28	Period of Performance Potential End Date	Accuracy	97	n/a	97	48	n/a	48	3	n/a	3	6.25%	n/a	6.25%	3.09%	13.40%
29	Ordering Period End Date	Accuracy	97	n/a	97	12	n/a	12	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
30*	Primary Place of Performance Address	Accuracy	97	643	740	37	109	146	4	0	4	10.81%	0.00%	1.42%	0.54%	2.16%
31*	Primary Place of Performance Congressional District	Accuracy	97	643	740	37	107	144	2	0	2	5.41%	0.00%	0.71%	0.27%	2.03%
32	Primary Place of Performance Country Code	Accuracy	97	643	740	48	110	158	1	0	1	2.08%	0.00%	0.27%	0.13%	1.08%
33*	Primary Place of Performance Country Name	Accuracy	97	643	740	48	110	158	1	0	1	2.08%	0.00%	0.27%	0.13%	1.08%
34	Award ID Number (PIID/FAIN)	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
35*	Record Type	Accuracy	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
36*	Action Type	Accuracy	97	643	740	41	110	151	2	0	2	4.88%	0.00%	0.64%	0.27%	1.76%
37*	Business Types	Accuracy	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>22</sup>			Errors <sup>23</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
38*	Funding Agency Name	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
39*	Funding Agency Code	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
40*	Funding Sub-Tier Agency Name	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
41	Funding Sub-Tier Agency Code	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
42*	Funding Office Name	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
43	Funding Office Code	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
44*	Awarding Agency Name	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
45*	Awarding Agency Code	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
46*	Awarding Sub-Tier Agency Name	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
47	Awarding Sub-Tier Agency Code	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
48*	Awarding Office Name	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
49	Awarding Office Code	Accuracy	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
50	Object Class	Accuracy	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
51	Appropriations Account	Accuracy	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
53	Obligation	Accuracy	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
54	Unobligated Balance	Accuracy	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>22</sup>			Errors <sup>23</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
56	Program Activity	Accuracy	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
57	Outlay (Gross Outlay Amounts by Award CPE)	Accuracy	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
163	National Interest Action	Accuracy	97	n/a	97	60	n/a	60	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
430	Disaster Emergency Fund Code	Accuracy	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
<b>Total Data Elements Tested</b>			<b><u>4,462</u></b>	<b><u>23,791</u></b>	<b><u>28,253</u></b>	<b><u>2,447</u></b>	<b><u>3,888</u></b>	<b><u>6,335</u></b>	<b><u>116</u></b>	<b><u>67</u></b>	<b><u>183</u></b>					

Note: Projected error rates represent point estimates; lower and upper limits of error rates represent the minimum and maximum possible error rate at the 95 percent confidence level.

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

**Table 11: Data Elements Tested, Errors, Projected Error Rates, and Lower- and Upper-Limit Error Rates  
Completeness Characteristic**

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>24</sup>			Errors <sup>25</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
1*	Awardee/Recipient	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%

<sup>24</sup> Ibid.

<sup>25</sup> Ibid.

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>24</sup>			Errors <sup>25</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates	
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total						
	Legal Entity Name <sup>12</sup>																
2	Awardee/ Recipient Unique Identifier	Completeness	97	643	740	60	110	170	0	2	2	0.00%	1.82%	1.58%	0.27%	5.14%	
3*	Ultimate Parent Unique Identifier	Completeness	97	643	740	60	21	81	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	
4*	Ultimate Parent Legal Entity Name	Completeness	97	643	740	60	24	84	0	3	3	0.00%	12.50%	10.86%	2.43%	27.70%	
5*	Legal Entity Address	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	
6*	Legal Entity Congressional District	Completeness	97	643	740	45	107	152	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	
7*	Legal Entity Country Code	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	
8*	Legal Entity Country Name	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	
11*	Amount of Award	Completeness	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%	
12	Non-Federal Funding Amount	Completeness	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%	
13	Federal Action Obligation	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>24</sup>			Errors <sup>25</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
14	Current Total Value of Award	Completeness	97	n/a	97	48	n/a	48	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
15*	Potential Total Value of Award	Completeness	97	n/a	97	60	n/a	60	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
16*	Award Type	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
17	NAICS Code	Completeness	97	n/a	97	60	n/a	60	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
18*	NAICS Description	Completeness	97	n/a	97	60	n/a	60	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
19	CFDA Number	Completeness	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
20*	CFDA Title	Completeness	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
22	Award Description	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
23	Award Modification / Amendment Number	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
24	Parent Award ID Number	Completeness	97	n/a	97	35	n/a	35	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
25	Action Date	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
26	Period of Performance Start Date	Completeness	97	n/a	97	60	n/a	60	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
27	Period of Performance Current End Date	Completeness	97	n/a	97	48	n/a	48	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
28	Period of Performance	Completeness	97	n/a	97	48	n/a	48	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>24</sup>			Errors <sup>25</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
	Potential End Date															
29	Ordering Period End Date	Completeness	97	n/a	97	12	n/a	12	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
30*	Primary Place of Performance Address	Completeness	97	643	740	37	109	146	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
31*	Primary Place of Performance Congressional District	Completeness	97	643	740	37	107	144	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
32	Primary Place of Performance Country Code	Completeness	97	643	740	48	110	158	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
33*	Primary Place of Performance Country Name	Completeness	97	643	740	48	110	158	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
34	Award ID Number (PIID/FAIN)	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
35*	Record Type	Completeness	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%
36*	Action Type	Completeness	97	643	740	41	110	151	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
37*	Business Types	Completeness	n/a	643	643	n/a	110	110	n/a	0	0	n/a	0.00%	0.00%	0.00%	0.00%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>24</sup>			Errors <sup>25</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
38*	Funding Agency Name	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
39*	Funding Agency Code	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
40*	Funding Sub-Tier Agency Name	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
41	Funding Sub-Tier Agency Code	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
42*	Funding Office Name	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
43	Funding Office Code	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
44*	Awarding Agency Name	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
45*	Awarding Agency Code	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
46*	Awarding Sub-Tier Agency Name	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
47	Awarding Sub-Tier Agency Code	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
48*	Awarding Office Name	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
49	Awarding Office Code	Completeness	97	643	740	60	110	170	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%
50	Object Class	Completeness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
51	Appropriations Account	Completeness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>24</sup>			Errors <sup>25</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
53	Obligation	Completeness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
54	Unobligated Balance	Completeness	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
56	Program Activity	Completeness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
57	Outlay (Gross Outlay Amounts by Award CPE)	Completeness	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
163	National Interest Action	Completeness	97	n/a	97	60	n/a	60	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
430	Disaster Emergency Fund Code	Completeness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
<b>Total Data Elements Tested</b>			<b><u>4,462</u></b>	<b><u>23,791</u></b>	<b><u>28,253</u></b>	<b><u>2,447</u></b>	<b><u>3,888</u></b>	<b><u>6,335</u></b>	<b><u>0</u></b>	<b><u>5</u></b>	<b><u>5</u></b>					

Note: Projected error rates represent point estimates; lower and upper limits of error rates represent the minimum and maximum possible error rate at the 95 percent confidence level.

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

**Table 12: Data Elements Tested, Errors, Projected Error Rates, and Lower- and Upper-Limit Error Rates  
Timeliness Characteristic**

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>26</sup>			Errors <sup>27</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
1*	Awardee/ Recipient Legal Entity Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
2	Awardee/ Recipient Unique Identifier	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
3*	Ultimate Parent Unique Identifier	Timeliness	97	643	740	60	21	81	10	15	25	16.67%	71.43%	64.25%	44.06%	79.10%
4*	Ultimate Parent Legal Entity Name	Timeliness	97	643	740	60	24	84	10	19	29	16.67%	79.17%	70.97%	52.84%	82.62%
5*	Legal Entity Address	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
6*	Legal Entity Congressional District	Timeliness	97	643	740	45	107	152	10	88	98	22.22%	82.24%	74.38%	67.57%	79.86%
7*	Legal Entity Country Code	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
8*	Legal Entity Country Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
11*	Amount of Award	Timeliness	n/a	643	643	n/a	110	110	n/a	91	91	n/a	82.73%	82.73%	75.12%	88.65%

<sup>26</sup> Ibid.

<sup>27</sup> Ibid.

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>26</sup>			Errors <sup>27</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
12	Non-Federal Funding Amount	Timeliness	n/a	643	643	n/a	110	110	n/a	91	91	n/a	82.73%	82.73%	75.12%	88.65%
13	Federal Action Obligation	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
14	Current Total Value of Award	Timeliness	97	n/a	97	48	n/a	48	6	n/a	6	12.50%	n/a	12.50%	7.23%	21.66%
15*	Potential Total Value of Award	Timeliness	97	n/a	97	60	n/a	60	10	n/a	10	16.67%	n/a	16.67%	11.34%	23.71%
16*	Award Type	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
17	NAICS Code	Timeliness	97	n/a	97	60	n/a	60	10	n/a	10	16.67%	n/a	16.67%	11.34%	23.71%
18*	NAICS Description	Timeliness	97	n/a	97	60	n/a	60	10	n/a	10	16.67%	n/a	16.67%	11.34%	23.71%
19	CFDA Number	Timeliness	n/a	643	643	n/a	110	110	n/a	91	91	n/a	82.73%	82.73%	75.12%	88.65%
20*	CFDA Title	Timeliness	n/a	643	643	n/a	110	110	n/a	91	91	n/a	82.73%	82.73%	75.12%	88.65%
22	Award Description	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
23	Award Modification/Amendment Number	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
24	Parent Award ID Number	Timeliness	97	n/a	97	35	n/a	35	8	n/a	8	22.86%	n/a	22.86%	13.41%	36.09%
25	Action Date	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
26	Period of Performance Start Date	Timeliness	97	n/a	97	60	n/a	60	10	n/a	10	16.67%	n/a	16.67%	11.34%	23.71%
27	Period of Performance	Timeliness	97	n/a	97	48	n/a	48	6	n/a	6	12.50%	n/a	12.50%	7.23%	21.66%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>26</sup>			Errors <sup>27</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
	Current End Date															
28	Period of Performance Potential End Date	Timeliness	97	n/a	97	48	n/a	48	6	n/a	6	12.50%	n/a	12.50%	7.23%	21.66%
29	Ordering Period End Date	Timeliness	97	n/a	97	12	n/a	12	4	n/a	4	33.33%	n/a	33.33%	11.34%	62.89%
30*	Primary Place of Performance Address	Timeliness	97	643	740	37	109	146	5	90	95	13.51%	82.57%	73.52%	66.84%	79.00%
31*	Primary Place of Performance Congressional District	Timeliness	97	643	740	37	107	144	5	88	93	13.51%	82.24%	73.23%	66.43%	78.73%
32	Primary Place of Performance Country Code	Timeliness	97	643	740	48	110	158	6	91	97	12.50%	82.73%	73.52%	66.87%	78.80%
33*	Primary Place of Performance Country Name	Timeliness	97	643	740	48	110	158	6	91	97	12.50%	82.73%	73.52%	66.87%	78.80%
34	Award ID Number (PIID/FAIN)	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
35*	Record Type	Timeliness	n/a	643	643	n/a	110	110	n/a	91	91	n/a	82.73%	82.73%	75.12%	88.65%
36*	Action Type	Timeliness	97	643	740	41	110	151	8	91	99	19.51%	82.73%	74.44%	67.74%	79.80%
37*	Business Types	Timeliness	n/a	643	643	n/a	110	110	n/a	91	91	n/a	82.73%	82.73%	75.12%	88.65%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>26</sup>			Errors <sup>27</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
38*	Funding Agency Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
39*	Funding Agency Code	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
40*	Funding Sub-Tier Agency Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
41	Funding Sub-Tier Agency Code	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
42*	Funding Office Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
43	Funding Office Code	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
44*	Awarding Agency Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
45*	Awarding Agency Code	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
46*	Awarding Sub-Tier Agency Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
47	Awarding Sub-Tier Agency Code	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
48*	Awarding Office Name	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
49	Awarding Office Code	Timeliness	97	643	740	60	110	170	10	91	101	16.67%	82.73%	74.07%	67.42%	79.30%
50	Object Class	Timeliness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
51	Appropriations Account	Timeliness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
53	Obligation	Timeliness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

Data Element Number	Data Elements Tested	Characteristic	Population			Sample <sup>26</sup>			Errors <sup>27</sup>			D1 (Stratum 1) Projected Error Rates	D2 (Stratum 2) Projected Error Rates	Weighted Projected Error Rates	Weighted Lower-Limit Error Rates	Weighted Upper-Limit Error Rates
			File D1	File D2	Total	File D1	File D2	Total	File D1	File D2	Total					
54	Unobligated Balance	Timeliness	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
56	Program Activity	Timeliness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
57	Outlay (Gross Outlay Amounts by Award CPE)	Timeliness	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
163	National Interest Action	Timeliness	97	n/a	97	60	n/a	60	10	n/a	10	16.67%	n/a	16.67%	11.34%	23.71%
430	Disaster Emergency Fund Code	Timeliness	97	n/a	97	40	n/a	40	0	n/a	0	0.00%	n/a	0.00%	0.00%	0.00%
<b>Total Data Elements Tested</b>			<b><u>4,462</u></b>	<b><u>23,791</u></b>	<b><u>28,253</u></b>	<b><u>2,447</u></b>	<b><u>3,888</u></b>	<b><u>6,335</u></b>	<b><u>370</u></b>	<b><u>3,212</u></b>	<b><u>3,582</u></b>					

Note: Projected error rates represent point estimates; lower and upper limits of error rates represent the minimum and maximum possible error rate at the 95 percent confidence level.

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

**Appendix B: Comparative Results from 2021 and 2019 DATA Act Audits**

EXIM'S COMPARATIVE RESULTS FOR DATA ELEMENTS <i>Based on Accuracy Error Rate in Descending Order</i>		WEIGHTED PROJECTED ERROR RATE (Accuracy Characteristic)		
DAIMS Data Element Number	Data Element Name	2021	2019	Percent Change
15*	Potential Total Value of Award	26.67%	33.90%	-21.33%
13	Federal Action Obligation	22.91%	27.03%	-15.24%
27	Period of Performance Current End Date	20.84%	10.82%	92.61%
5*	Legal Entity Address	19.65%	18.82%	4.41%
4*	Ultimate Parent Legal Entity Name	16.67%	15.26%	9.24%
14	Current Total Value of Award	16.67%	2.59%	543.63%
3*	Ultimate Parent Unique Identifier	6.76%	8.92%	-24.22%
28	Period of Performance Potential End Date	6.25%	20.34%	-69.27%
26	Period of Performance Start Date	5.00%	15.73%	-68.21%
1*	Awardee/Recipient Legal Entity Name	3.68%	2.85%	29.12%
25	Action Date	3.16%	4.07%	-22.36%
6*	Legal Entity Congressional District	3.02%	0.75%	302.67%
22	Award Description	2.84%	2.33%	21.89%
2	Awardee or Recipient Unique Identifier	2.67%	2.85%	-6.32%
17	NAICS Code	1.67%	1.70%	-1.76%
30*	Primary Place of Performance Address	1.42%	5.83%	-75.64%
31*	Primary Place of Performance Congressional District	0.71%	0.00%	100.00%
16*	Award Type	0.66%	9.08%	-92.73%
36*	Action Type	0.64%	1.63%	-60.74%
32	Primary Place of Performance Country Code	0.27%	0.00%	100.00%
33*	Primary Place of Performance Country Name	0.27%	0.00%	100.00%
7*	Legal Entity Country Code	0.00%	0.52%	-100.00%
8*	Legal Entity Country Name	0.00%	0.52%	-100.00%
11*	Amount of Award	0.00%	23.67%	-100.00%
12	Non-Federal Funding Amount	0.00%	0.00%	0.00%
18*	(NAICS Description	0.00%	1.70%	-100.00%
19	CFDA Number	0.00%	0.00%	0.00%
20*	CFDA Title	0.00%	0.00%	0.00%
23	Award Modification/ Amendment Number	0.00%	0.76%	-100.00%

EXPORT-IMPORT BANK – OFFICE OF INSPECTOR GENERAL

DAIMS Data Element Number	Data Element Name	2021	2019	Percent Change
24	Parent Award ID Number	0.00%	0.00%	0.00%
29	Ordering Period End Date	0.00%	100.00%	-100.00%
34	Award ID Number (PIID/ FAIN)	0.00%	0.00%	0.00%
35*	Record Type	0.00%	0.00%	0.00%
37*	Business Types	0.00%	0.00%	0.00%
38*	Funding Agency Name	0.00%	0.00%	0.00%
39*	Funding Agency Code	0.00%	0.00%	0.00%
40*	Funding Sub-Tier Agency Name	0.00%	0.00%	0.00%
41	Funding Sub-Tier Agency Code	0.00%	0.00%	0.00%
42*	Funding Office Name	0.00%	26.71%	-100.00%
43	Funding Office Code	0.00%	26.71%	-100.00%
44*	Awarding Agency Name	0.00%	0.00%	0.00%
45*	Awarding Agency Code	0.00%	0.00%	0.00%
46*	Awarding Sub-Tier Agency Name	0.00%	0.00%	0.00%
47	Awarding Sub-Tier Agency Code	0.00%	0.00%	0.00%
48*	Awarding Office Name	0.00%	26.71%	-100.00%
49	Awarding Office Code	0.00%	26.71%	-100.00%
50	Object Class	0.00%	n/a	n/a
51	Appropriations Account	0.00%	n/a	n/a
53	Obligation	0.00%	n/a	n/a
56	Program Activity	0.00%	n/a	n/a
163	National Interest Action	0.00%	n/a	n/a
430	Disaster Emergency Fund Code	0.00%	n/a	n/a
54	Unobligated Balance	n/a	n/a	n/a
57	Outlay (File C – Gross Outlay Amount by Award CPE)	n/a	n/a	n/a

\* This data element may be derived (depending on whether the award is a procurement or financial assistance award) by an external system such as FPDS, FABS, or SAM, based upon data provided by EXIM.

## **Appendix C: Management's Response**



November 4, 2021

Jennifer Fain  
Acting Inspector General  
Office of the Inspector General  
Export-Import Bank of the United States  
811 Vermont Avenue, NW  
Washington, DC 20571

Dear Ms. Fain,

Thank you for providing the Export-Import Bank of the United States (“EXIM Bank” or “the Bank”) management with the Office of the Inspector General’s (“OIG”) audit report on “EXIM’s DATA Act Submission”, OIG-AR-22-01, dated November 8, 2021, (the “DATA Act audit report”). Management continues to support the OIG’s work which complements the Bank’s efforts to continually improve its processes. EXIM Bank is proud of the strong and cooperative relationship it has with the OIG.

EXIM Bank appreciates the OIG’s conclusion that “EXIM’s processes for implementing and complying with the DATA Act requirements have continued to improve since the 2019 DATA Act audit.”

Additionally, EXIM values the OIG’s determination that “based on the results of our detailed tests of data elements for a statistically valid sample, we assessed the quality of EXIM’s data to be of higher quality.”

Also, EXIM appreciates the OIG noting that EXIM “submitted and certified its second quarter of FY 2021 DATA Act files by the submission due date.”

The Bank continuously strives to improve its policies and practices and agrees to all 12 OIG recommendations issued in the DATA Act audit report. Additionally, as of the issuance date of this report, EXIM Organization structure has been realigned and the Office of Acquisitions and Business Services is no longer part of the Office of Chief Financial Officer (OCFO) and it is now part of the Office of Resource Management.

Recommendation 1: that the SAO and EXIM’s DATA Act Working Group determine the root cause of the errors in EXIM-provided data identified during the testing of the second quarter FY 2021 Files D1 and D2, and take necessary corrective action to (a) correct the errors for records shown in USASpending.gov, (b) identify the risk of reporting incorrect data for each data element containing the error, and (c) update the policies and procedures for recording data in Comprizon, FPDS, and FABS to address the risks, and to include adequate verification and validation review processes performed by the data owner and a supervisor or other independent party.

Management response: Management agrees with the recommendation. EXIM will determine the root cause of the errors in identified EXIM-provided data, and take necessary corrective action to (a) correct the errors for records shown in USASpending.gov, (b) identify the risk of reporting incorrect data for each data element containing the error, and (c) update the policies and procedures for recording data in Comprizon, FPDS, and FABS to address the risks, and to include adequate verification and validation review processes performed by the data owner and a supervisor or other independent party.

Recommendation 2: that the SAO and EXIM’s DATA Act Working Group continue to improve the design of its review of the procurement award data in FPDS and financial assistance award data submissions to FABS, by identifying the root cause for the exceptions in those data elements for which EXIM is responsible, and by developing more effective review procedures for those data elements, as well as the data elements that the SAO and DATA Act Working Group identify as having a high risk of not being accurate, complete, or reported timely.

Management response: Management agrees with the recommendation. EXIM will continue to improve the design of its review of the procurement award data in FPDS and financial assistance award data submissions to FABS, by identifying the root cause for the exceptions in those data elements for which EXIM is responsible, and by developing more effective review procedures for those data elements, as well as the data elements that the SAO and DATA Act Working Group identify as having a high risk of not being accurate, complete, or reported timely.

Recommendation 3: that the SAO and EXIM’s DATA Act Working Group review EXIM’s policies and procedures for submitting contract award data in FPDS, including procedures for reviewing and confirming the accuracy of the CAR, to ensure proper design and compliance with FAR guidelines for timeliness. Update the policies and procedures based on this review, as necessary, to ensure EXIM meets FAR timeliness guidelines.

Management response: Management agrees with the recommendation. To ensure proper design and compliance with FAR guidelines for timeliness, EXIM will review the Bank’s policies and procedures for submitting contract award data in FPDS, including procedures for reviewing and confirming the accuracy of the CAR.

Recommendation 4: that the SAO and EXIM’s DATA Act Working Group review EXIM’s policies and procedures that address timelines for submitting complete and accurate FABS files containing financial assistance award data, to ensure proper design and compliance with DAIMS guidance. Update the policies and procedures based on this review, as necessary, to ensure EXIM meets DAIMs timeliness guidelines.

Management response: Management agrees with the recommendation. To ensure EXIM meets DAIMs design, compliance, and timeliness guidelines, EXIM will review and update as necessary the Bank’s policies and procedures that address timelines for submitting complete and accurate FABS files containing financial assistance award data.

Recommendation 5: that the SAO and EXIM’s DATA Act Working Group complete a data inventory for File D1 that defines each data element based on government-wide financial data standards, and that EXIM seeks clarification from OMB and Treasury, as necessary, in order to ensure appropriate interpretation of the DATA Act Standards.

Management response: Management agrees with the recommendation. EXIM will complete a data inventory for File D1 that defines each data element based on government-wide financial data standards, and seeks clarification from OMB and Treasury, as necessary, in order to ensure appropriate interpretation of the DATA Act Standards.

Recommendation 6: that the SAO and EXIM's DATA Act Working Group establish policies and procedures to help ensure that all data reported in FABS and included in EXIM's certified File D2 are reported as intended by the Data Act Standards, and that EXIM seek clarification from OMB and Treasury, if necessary, in order to ensure appropriate interpretation of the Data Act Standards.

Management response: Management agrees with the recommendation. EXIM will establish policies and procedures to help ensure that all data reported in FABS and included in EXIM's certified File D2 are reported as intended by the Data Act Standards, and that EXIM seek clarification from OMB and Treasury, if necessary, in order to ensure appropriate interpretation of the Data Act Standards.

Recommendation 7: that the SAO and EXIM's DATA Act Working Group complete a data inventory for each of Files A through D1 to govern its DATA Act activities and help ensure compliance with government-wide financial data standards.

Management response: Management agrees with the recommendation. To govern its DATA Act activities and help ensure compliance with government-wide financial data standards, EXIM will complete a data inventory for each of Files A through D1.

Recommendation 8: that the SAO and EXIM's Working Group develop and document a review process of the data inventories for Files A through D2 that EXIM will perform at regular intervals and after each DAIMS update.

Management response: Management agrees with the recommendation. EXIM will develop and document a review process of the data inventories for Files A through D2 that EXIM will perform at regular intervals and after each DAIMS update.

Recommendation 9: that the SAO and EXIM's Working Group develop, test, and implement a DQP that covers significant milestones and major decisions pertaining to:

- Organizational structure and key processes providing internal control activities for spending reporting.
- Management's responsibility to supply quality data to meet the reporting objectives for the DATA Act in accordance with OMB Circular No. A-123.
- EXIM's Testing plan and identification of high-risk reported data, including: (1) specific data the agency determines to be high-risk that are explicitly referenced by the DATA Act and (2) confirmation that these data are linked through the inclusion of the award identifier in the agency's financial system, and reported with plain English award descriptions.
- Actions taken to manage identified risks.

Management response: Management agrees with the recommendation. EXIM will develop, test, and implement a DQP that covers significant milestones and major decisions pertaining to the aspects listed in the recommendation above.

Recommendation 10: that the SAO in coordination with the OCFO continue to implement its corrective action plan to ensure that object class codes are accurately and completely reported in all financial and award data submissions (Files B and C).



Management response: Management agrees with the recommendation. EXIM will continue to implement its corrective action plan to ensure that object class codes are accurately and completely reported in all financial and award data submissions (Files B and C).

Recommendation 11: that the SAO in coordination with the OCFO design and implement a reconciliation mapping process that includes all GL accounts that comprise each File-A data element, and use it consistently for each reconciliation.

Management response: Management agrees with the recommendation. EXIM will design and implement a reconciliation mapping process that includes all GL accounts that comprise each File-A data element, and use it consistently for each reconciliation.

Recommendation 12: that the SAO in coordination with the OCFO ensure that it fully documents the nature, cause, and resolution of variances that exist in the reconciliations.

Management response: Management agrees with the recommendation. EXIM will update processes to include fully documenting the nature, cause, and resolution of variances that exist in the reconciliations.

We thank the OIG for your efforts to ensure EXIM’s policies and procedures continue to improve, as well as the work you do with us to protect EXIM funds from fraud, waste, and abuse. We look forward to strengthening our working relationship and continuing to work closely with the Office of the Inspector General.

Sincerely,

**ADAM  
MARTINEZ**

Digitally signed by  
ADAM MARTINEZ  
Date: 2021.11.04  
11:18:39 -04'00'

Adam Martinez  
Chief Management Officer  
Export-Import Bank of the United States

## **Appendix D: Distribution List**

James Burrows, Jr., Acting President and Chair of EXIM Board of Directors  
James Cruse, Acting First Vice President and Vice Chair of EXIM Board of Directors  
Adam Martinez, Senior Vice President and Chief Management Officer  
Madolyn Phillips, Deputy Chief Banking Officer  
Kenneth Tinsley, Senior Vice President and Chief Risk Officer  
Mary Jean Buhler, Chief Financial Officer  
Henry Pitney, Acting Senior Vice President and General Counsel  
Inci Tonguch-Murray, Senior Vice President and Deputy Chief Financial Officer  
Maria Fleetwood, Vice President of Acquisition and Business Services  
Catherine Nocera, Partner, Cotton & Company  
Courtney Potter, Deputy AIG for Audits and Evaluations, OIG  
Jaquone Miller, Project Manager, OIG  
Amanda Myers, Senior Counsel, OIG

**Office of Inspector General**

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