



Council of the
INSPECTORS GENERAL
on INTEGRITY and EFFICIENCY

June 14, 2010

Honorable Mike Quigley
1319 Longworth House Office Building
Washington, DC 20515

Re: H.R. 4983-The Transparency in Government Act

Dear Congressman Quigley:

As Chair of the Legislation Committee of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), I am writing to provide comments regarding H.R. 4983, The Transparency in Government Act, which places certain requirements on the Inspector General (IG) community to review Federal agency awards data. As further explained below, the IG community believes that the purpose of the legislation can be achieved by providing IGs with more flexibility in reviewing the accuracy and completeness of Federal awards data.

The Federal Funding Accountability and Transparency Act of 2006 (FFATA)¹ requires OMB to ensure the existence and operation of a searchable public website that provides comprehensive information on Federal awards to contractors and subcontractors. The website is currently located at USAspending.gov. Section 502 of H.R. 4983 would add a new section to the FFATA that would require IGs to review “a statistically representative sample of agency Federal awards” every six months for an initial period of three years and then annually thereafter. The purpose of this strict review requirement is to determine whether agencies have “appropriate measures in place to review Federal Funding Accountability and Transparency data submissions for accuracy and completeness.”²

We surveyed the 69 CIGIE members about this provision and received responses from 34 members. Our survey revealed that over 70% of respondents have concerns about the review requirement as it is currently written. While the IG community supports the goals of accuracy and completeness in data provided by agencies to USAspending.gov, more than one-third of respondents commented that the strict review requirement would strain already limited resources, potentially diverting attention away from higher priority areas.³

¹ Public Law 109-282, amending 31 USC 6101.

² The new IG review requirement would be incorporated into the FFATA at section 5(a)(3)(A).

³ Additionally, thirteen IGs estimated that they would need to hire 1-3 additional audit staff to satisfy the proposed mandate.

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In addition, some IGs believe that the strict review requirement under section 502 is inconsistent with the standard, risk-based approach to audit planning common in the IG community. Five of the IGs who provided this feedback recommended performing an initial review within the first year of enactment, and then determining the frequency of subsequent reviews, as necessary, based on prior error rates, other risk factors, and the unique circumstances of their agencies. In this way, IGs would be permitted to reorient limited resources away from biannual or annual reviews of FFATA submissions and towards riskier programs and operations when appropriate.

The Legislation Committee believes that the current language of HR 4983 could be amended to provide IGs with added flexibility without undermining the purpose of the legislation. Thus, we propose that the following language be substituted for section 5(a)(3)(A):

(3) Each agency inspector general--- (A) reviews a statistically representative sample of agency Federal awards within the first year following enactment of this section, and as necessary thereafter based on prior error rates and other risk factors, to determine whether agencies have appropriate measures in place to review Federal Funding Accountability and Transparency data submissions for accuracy and completeness.”

The CIGIE Legislation Committee appreciates the opportunity to present this important issue to the IG community. If you have any questions or need more information, please do not hesitate to contact me at 202-512-2288.

Sincerely,



J. Anthony Ogden
Inspector General
U.S. Government Printing Office

cc: Hon. Jeffrey Zients, Deputy Director for Management, OMB
Hon. Phyllis Fong, Chair, CIGIE
Carl Clinefelter, Vice-Chair, CIGIE