

## ***CONTROLLER ALERT: DATA Act Implementation and Offices for Financial Assistance Awards***

*Controller Alerts are designed to highlight emerging financial management issues that may require agency attention or action. These Alerts are intended to inform the Chief Financial Officer (CFO) community of key issues where the Office of Management and Budget (OMB) believes further action may be warranted, but do not constitute official guidance or prescribe specific tasks for agencies beyond consideration of appropriate steps to address the issue. Additional Controller Alerts can be viewed at <https://cfo.gov/document-library/>.*

This Controller Alert provides information on adhering to DATA Act implementation requirements to provide clarity to the Federal financial assistance community. In order to implement the DATA Act, agencies must comply with [OMB Memorandum M-15-12](#) and other applicable regulations and guidelines. This Controller Alert clarifies specific sections of M-15-12 and some deadlines.

### *Requirement to Comply with Data Standards*

Pursuant to M-15-12, agencies are required to implement data standards by May 9, 2017. These data definition standards are housed at: <https://max.gov/datastandards>. These standards are to be used for reporting to USAspending.gov (or successor site) by the implementation date, however, they do not supersede existing regulation. Since many of these standards may not have impacts on financial assistance recipients, OMB will continue to work with the Federal financial assistance community on any necessary changes to 2 CFR 200 as a result of these standards. Any changes to regulation will follow the rulemaking process.

### *Requirement to Link Award and Account Level Data*

Pursuant to M-15-12, agencies are required to carry the prime award identification number (award ID) in their financial management systems. This must be the full prime award ID, which is the Federal Award Identification Number (FAIN) for financial assistance and the Procurement Instrument Identifier (PIID) for procurement. Where some agencies currently have linkages using other data elements, they must also carry the award ID in their financial system to meet the requirement in M-15-12. This is the key to reporting financial data from financial management systems for awards, including every Treasury Account Symbol (TAS) for each award. In order to meet the reporting deadlines in M-15-12, some agencies may need to use an interim solution to accomplish this linkage. Agencies should continue to work with OMB and Treasury on their implementation timeline and approach to ensure they are on a path to meeting reporting deadlines and adhering to policy guidance.

### *Funding and Awarding Offices for Financial Assistance Awards*

Since the enactment of the Federal Funding Accountability and Transparency Act (FFATA), additional legislation, administrative policies, and advancements in data analytics, have expanded the amount of data the Federal Government provides the public. In an effort to gain additional insight into Federal spending, both within the Federal financial assistance community,

and across communities, the Federal financial assistance community decided to adopt the Activity Address Code (AAC) standard for funding and awarding offices. In July 2015, the Financial Assistance Committee for E-Government (FACE) adopted the use of the AAC as the authoritative identifier for office and is taking steps towards implementation. This standard is already used by the Federal procurement community.<sup>1</sup>

The AAC is the authoritative means for identifying funding and awarding offices, and will link agency offices to their corresponding Federal agency. The AAC will be used as the key component for identifying awarding and funding offices within the Federal Hierarchy in the Integrated Award Environment (IAE). Use of the AAC will provide a consistent structure of organizations and give agencies control over changes, improving consistency of reporting. For more information on implementing AAC for the financial assistance community, please refer to the document “Information on Defining Funding and Awarding Offices for Financial Assistance” on MAX [here](#).

The Federal Hierarchy in the IAE will be used to centrally track agency hierarchies for organizations engaged in awarding and funding Federal awards. Agencies will administer their own hierarchies using tools that will be provided by the IAE.

Federal awarding agencies are expected to report offices engaged in funding and/or awarding Federal financial assistance awards. Consistent with the data standards work done to develop the DATA Act data standards, by March 31, 2016, agencies should provide the General Services Administration (GSA) with a list of financial assistance offices and their corresponding AAC. Information about the AAC and submission of this information can be found [here](#). Offices should follow the characteristics of an office found in the white paper for Sub Tier Agency and Office Information [here](#).

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<sup>1</sup> Uniform Procurement Identification 79 Fed. Reg. 61,739 (October 14, 2014) (codified at FAR 2.101, 4.605, and 4.1601 – 4.1603).