

FY 2020 OMB Supplemental Data Call

General Services Administration

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Agency-Wide Responses

Question 2: Detecting and Recovering Improper Payments (PIIA Section: 3352(e), 3352(e) (1))

Please describe the steps the agency has taken to detect and recover improper payments.

ANSWER:

Indicate root cause	Indicate mitigation strategy/corrective action(s) taken	Provide any additional detail (optional free text)	Select the actual completion date for action(s) taken
9. Administrative or Process Errors Made by: Federal Agency	6-Audit (improve IC)	<p>♣GSA has a contract with a vendor to detect improper payments. Subsequently after GSA reviews and signs off on identified payments, a claim is established for vendors to remit funds or payment offsets are made to future payments to collect the funds.</p> <p>♣ Employee pay and benefits reconciliations are performed with human resources. When payroll overpayments are discovered, employee debts are established to recoup overpayments from future checks.</p>	Other

Question 2 Free Text: Detecting and Recovering Improper Payments (PIIA Section: 3352(e), 3352(e) (1))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: As good financial stewards, GSA complies with the Payment Integrity Information Act of 2019 and the Recovery Audit act. GSA is in compliance with improper payment reporting requirements. GSA understands the importance of maintaining robust payment integrity and audit recovery programs but also proactively seeks out instances of fraud against the agency. Fraud reduction efforts further demonstrates GSA commitment to financial integrity.

GSA has no programs identified as high risk or high priority for improper payment.

Question 3: Recovery Audits (PIIA Section: 3352)

Please describe the steps the agency has taken to recover improper payments identified in recovery audits. Please note there is a 3000 character limit.

ANSWER: For FY 2020, GSA had one program, Rental of Space, where a payment recapture audit was required. The Engagement Management Report for the recapture audit did not include any recommendations for corrective action.

GSA reviews the Rental of Space program annually to detect and recover overpayments or other errors, and identifies opportunities for process improvement. This review includes an analysis of lease contracts, lease amendments, and lease digest actions, as well as the development of a detailed monthly rental schedule from the beginning of a lease to its most recent payment. The results are compared to actual payments by month, to determine if discrepancies exist. Discrepancies are quantified and identified as to nature and origin.

Rent overpayments, rent credits, and real estate tax credits are sources of overpayments. Root causes for rent-related overpayments include calculation errors, administrative errors, system errors, failure to take the proper rent credits, failure to charge rent on time or at all, and failure to timely terminate the lease. In addition, overpayments for real estate tax credits are caused by failure of the lessor to comply with the lease contract and submit tax bills or refunds, the complexity in determining the base year tax amount, and improperly determining which line items of the tax bill GSA is required to pay.

To address rent-related overpayments, GSA has taken corrective action by providing Lease Payment Audit refresher training. In addition to training, GSA implemented a change from regional to zonal administration of lease payments for taxes and other rent adjustments. Changes include proactive review of each lease annually for compliance with tax clauses and documentation, and systemic corrective action through IT enhancements to provide national consistency and improve accuracy and timeliness.

GSA's payment recapture audit identifies claims related to the Rental of Space program. GSA establishes claims in accordance with the Debt Collection Improvement Act of 1996.

Question 4: Excluded Programs (PIIA Section: 3352(e) (7))

Please list any programs the agency excluded from review under its payment recapture audit program because a payment recovery audit program was determined to not be cost-effective and provide a summary of the justification used to make that determination. Please note there is a 3000 character limit.

ANSWER: GSA has one program, Rental of Space which is subject to FY 2020 payment recapture auditing. In FY 2018, GSA evaluated and determined recapture auditing was not cost effective for the following programs:

GSA had 39 programs subject to potential Payment Recapture audit and does full payment recapture audit on 1 program, Rental of Space. Of the remaining 38 programs:

GSA has 9 programs that are below the \$1 million requirement and therefore were not considered for payment recapture auditing.

Additionally, 1 program has lapsed funding, and therefore was not considered for payment recapture auditing. There will be no more expenditure for this program.

GSA has 16 programs with no history of improper payments. Since there are no improper payments, a payment recapture audit would not apply to these programs.

GSA did not analyze payments to support the GSA Office of the Inspector General programs. This Office's mission requires it to be independent as established by the Inspector General Act.

The remaining 11 programs Integrated Technology Services (ITS) - Flow-Through, Building Operations, Assisted Acquisition Services (AAS) - Flow-Thru, Operating Expenses (Reimbursable),

Repairs and Alterations, Acquisition Services Fund Operating, Construction and Acquisition of Facilities, Special Services and Improvements, Government Wide Policy (Reimbursable), Federal Citizen Services Fund (Reimbursable), and Operating Expenses (Direct) were tested and determined not to be cost effective for recapture auditing

Question 5: Financial and Administrative Controls (PIIA Section: 3357(d))

Please describe your agency's progress:

- *Implementing the financial and administrative controls established by OMB in OMB Circular A-123 to identify and assess fraud risks and design and implement control activities in order to prevent, detect, and respond to fraud, including improper payments; the fraud risk principle in the Standards for Internal Control in the Federal Government published by the Government Accountability Office (commonly known as the "Green Book"); and Office of Management and Budget Circular A-123, with respect to the leading practices for managing fraud risk;*
- *Identifying risk and vulnerabilities to fraud, and*
- *Establishing strategies, procedures, and other steps to curb fraud.*

ANSWER:

Implementation of OMB Circular A-123	Implementation of GAO Green Book	Identifying Risk and Vulnerabilities	Establishing Strategies, Procedures and Other steps
2 – Established	2 – Established	2 – Established	2 – Established

Question 5 Free Text: Financial and Administrative Controls (PIIA Section: 3357(d))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: The agency’s senior assessment team, the Management Control Oversight Council, chaired by the Deputy Administrator, is responsible for establishing governance for GSA’s senior managers to provide the leadership and oversight necessary for effective implementation of the agency’s Internal Control Program.

GSA evaluates internal controls across the agency at various levels of the organization. GSA management is responsible for establishing goals and objectives around operating environments, ensuring compliance with relevant laws and regulations, and managing both expected and unanticipated events. Employees across the organization are responsible for understanding the controls applicable to their workflows and applying them in accordance with internal control guidance.

In FY 2020, GSA took a significant step to increase and reinforce internal control compliance. The agency developed and launched virtual mandatory internal control training for all GSA employees, outlining relevant and applicable A-123 standards and best practices. GSA will update training material and require employees to complete the training annually.

Additionally, during this fiscal year, GSA worked to address the Office of Inspector General’s (OIG) management challenge related to internal controls. GSA focused on increasing accountability, resolving audit recommendations in a more timely manner, and implementing a more effective system of internal control agency-wide. Specifically, program audit resolution is monitored by senior executives, program managers, and staff through performance dashboards. GSA spent considerable time this fiscal year closing out audit recommendations.

In response to the pandemic, GSA proactively conducted analysis to understand the impact to drivers of several key risks. In FY 2020, GSA conducted a survey of its senior executives to identify the level of concern related to several enterprise risks, highlighting threats and risks to business units and the agency. The results of the survey were shared and discussed with the Enterprise Management Board, as well as all senior leadership. Based on the survey results and follow-up discussions, GSA made adjustments to the annual risk profile and prioritized some risks for additional analysis and planning. Risks are managed throughout the year at the appropriate program level, with certain cross-cutting risks monitored and discussed at the enterprise level through existing governance mechanisms and decision bodies.

Question 6: Statutory Thresholds and Risk Assessments (PIIA Section: 3352(a) (3) (C))

Please indicate the following:

- *Any programs not listed in this collection which were recently assessed to determine susceptibility of improper payments.*
 - *Whether it was likely to be above or below the statutory threshold.*
- *The FY for any programs not listed in this collection which were most recently assessed to determine whether it was likely to be above or below the statutory threshold.*
- *If they had substantial changes to RA methodology.*

ANSWER:

Program not listed	Likely to be above or below threshold?	Assessment Date	Substantial RA methodology changes??
	Likely to be Below Statutory Threshold	Other	N/A

Question 6 Free Text: Statutory Thresholds and Risk Assessments (PIIA Section: 3352(a) (3) (C))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Any programs not listed in these collections which were recently assessed to determine susceptibility of improper payments.

Answer: GSA did not recently identify any programs susceptible to improper payments.

Whether it was likely to be above or below the statutory threshold.

Answer; Not applicable

The FY for any programs not listed in these collections which were most recently assessed to determine whether it was likely to be above or below the statutory threshold.

Answer: Not applicable

If they had substantial changes to RA methodology.

Answer: GSA did not have any substantial changes to RA methodology.

ANSWER: Any programs not listed in these collections which were recently assessed to determine susceptibility of improper payments.

Rental of Space

Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate which of the six (6) criteria (if any) were determined to be non-compliant in the most recent IG compliance review.

ANSWER:

Indicate compliant or non-compliant	Compliance criteria
Compliant	1. Publish an AFR or PAR
Compliant	2. Conduct Program-Specific Risk Assessment
Compliant	3. Publish Improper Payment Estimates
Compliant	4. Publish Programmatic Corrective Action Plans
Compliant	5. Publish and Meet Annual Reduction Targets
Compliant	6. Report a gross Improper Payment Rate of Less than 10%

Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Answer: GSA is Compliant with payment accuracy reporting requirements.

Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Zero years. GSA is compliant. GSA is compliant with payment accuracy reporting requirements.

Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Please indicate whether the program uses the DNP (yes/no) and whether the Do Not Pay Initiative has reduced/prevented improper payments (yes/no). Additionally, please provide the frequency of corrections (week/month range) or identification of incorrect information (range of false hits?).

ANSWER:

Does the program use the Do Not Pay Initiative (DNP) (yes/no)	Has the DNP reduced/prevented improper payments (yes/no)	How frequently are corrections made?	How frequently is incorrect information identified?
YES	YES	Daily	Daily

Building Operations - Utilities

Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate which of the six (6) criteria (if any) were determined to be non-compliant in the most recent IG compliance review.

ANSWER:

Indicate compliant or non-compliant	Compliance criteria
Compliant	1. Publish an AFR or PAR
Compliant	2. Conduct Program-Specific Risk Assessment
Compliant	3. Publish Improper Payment Estimates
Compliant	4. Publish Programmatic Corrective Action Plans
Compliant	5. Publish and Meet Annual Reduction Targets
Compliant	6. Report a gross Improper Payment Rate of Less than 10%

Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is Compliant with payment accuracy reporting requirements.

Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Zero years. GSSA is compliant and

GSA is compliant with payment accuracy reporting requirements.

Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is compliant with payment accuracy reporting requirements.

Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is compliant with payment accuracy reporting requirements.

Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Please indicate whether the program uses the DNP (yes/no) and whether the Do Not Pay Initiative has reduced/prevented improper payments (yes/no). Additionally, please provide the frequency of corrections (week/month range) or identification of incorrect information (range of false hits?).

ANSWER:

Does the program use the Do Not Pay Initiative (DNP) (yes/no)	Has the DNP reduced/prevented improper payments (yes/no)	How frequently are corrections made?	How frequently is incorrect information identified?
YES	YES	Daily	Daily
YES	YES	Monthly	Monthly

Disaster Relief - Hurricane Sandy Fund

Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate which of the six (6) criteria (if any) were determined to be non-compliant in the most recent IG compliance review.

ANSWER:

Indicate compliant or non-compliant	Compliance criteria
Compliant	1. Publish an AFR or PAR
Compliant	2. Conduct Program-Specific Risk Assessment
Compliant	3. Publish Improper Payment Estimates
Compliant	4. Publish Programmatic Corrective Action Plans
Compliant	5. Publish and Meet Annual Reduction Targets
Compliant	6. Report a gross Improper Payment Rate of Less than 10%

Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is Compliant with payment accuracy reporting requirements.

Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Zero years. GSSA is compliant.

GSA is compliant with payment accuracy reporting requirements.

Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is compliant with payment accuracy reporting requirements.

Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A - GSA is compliant with payment accuracy reporting requirements.

Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Please indicate whether the program uses the DNP (yes/no) and whether the Do Not Pay Initiative has reduced/prevented improper payments (yes/no). Additionally, please provide the frequency of corrections (week/month range) or identification of incorrect information (range of false hits?).

ANSWER:

Does the program use the Do Not Pay Initiative (DNP) (yes/no)	Has the DNP reduced/prevented improper payments (yes/no)	How frequently are corrections made?	How frequently is incorrect information identified?
YES	YES	Daily	Daily
YES	YES	Monthly	Monthly

Integrated Technology Service - Wide Area Network

Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate which of the six (6) criteria (if any) were determined to be non-compliant in the most recent IG compliance review.

ANSWER:

Indicate compliant or non-compliant	Compliance criteria
Compliant	1. Publish an AFR or PAR
Compliant	2. Conduct Program-Specific Risk Assessment
Compliant	3. Publish Improper Payment Estimates
Compliant	4. Publish Programmatic Corrective Action Plans
Compliant	5. Publish and Meet Annual Reduction Targets
Compliant	6. Report a gross Improper Payment Rate of Less than 10%

Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is Compliant with payment accuracy reporting requirements.

Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Zero years. GSSA is compliant.

GSA is compliant with payment accuracy reporting requirements.

Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Please indicate whether the program uses the DNP (yes/no) and whether the Do Not Pay Initiative has reduced/prevented improper payments (yes/no). Additionally, please provide the frequency of corrections (week/month range) or identification of incorrect information (range of false hits?).

ANSWER:

Does the program use the Do Not Pay Initiative (DNP) (yes/no)	Has the DNP reduced/prevented improper payments (yes/no)	How frequently are corrections made?	How frequently is incorrect information identified?
YES	YES	Daily	Daily

Purchase Cards

Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate which of the six (6) criteria (if any) were determined to be non-compliant in the most recent IG compliance review.

ANSWER:

Indicate compliant or non-compliant	Compliance criteria
Compliant	1. Publish an AFR or PAR
Compliant	2. Conduct Program-Specific Risk Assessment
Compliant	3. Publish Improper Payment Estimates
Compliant	4. Publish Programmatic Corrective Action Plans
Compliant	5. Publish and Meet Annual Reduction Targets
Compliant	6. Report a gross Improper Payment Rate of Less than 10%

Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is Compliant with payment accuracy reporting requirements.

Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Zero years. GSSA is compliant.

N/A. GSA is compliant with payment accuracy reporting requirements.

Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Please indicate whether the program uses the DNP (yes/no) and whether the Do Not Pay Initiative has reduced/prevented improper payments (yes/no). Additionally, please provide the frequency of corrections (week/month range) or identification of incorrect information (range of false hits?).

ANSWER:

Does the program use the Do Not Pay Initiative (DNP) (yes/no)	Has the DNP reduced/prevented improper payments (yes/no)	How frequently are corrections made?	How frequently is incorrect information identified?
YES	YES	Daily	Daily
YES	YES	Monthly	Monthly

Question 16 Free Text: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Treasury screens each of GSA's summary schedules against the Do Not Pay system **daily**. Very few matches are returned. Most matches are for salary payments and are false positives (there is a valid reason for the payment) The Financial Management Systems O&M Division sends the Pegasys vendor table to the Do Not Pay portal on the 10th of each **month**. The matches are researched in Pegasys to verify that the vendor has been marked "Debarred" or "Inactive". The Debarment flag is interfaced from SAM. The Inactive flag is manually adjusted in Pegasys if the Debarment has not yet interfaced into Pegasys or if a vendor on the Death Master List is identified.

Other Sensitive Payments

Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate which of the six (6) criteria (if any) were determined to be non-compliant in the most recent IG compliance review.

ANSWER:

Indicate compliant or non-compliant	Compliance criteria
Compliant	1. Publish an AFR or PAR
Compliant	2. Conduct Program-Specific Risk Assessment
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Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: GSA is Compliant with payment accuracy reporting requirements.

Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: Zero years. GSSA is compliant

N/A. GSA is compliant with payment accuracy reporting requirements.

Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: N/A GSA is compliant with payment accuracy reporting requirements.

Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Please indicate whether the program uses the DNP (yes/no) and whether the Do Not Pay Initiative has reduced/prevented improper payments (yes/no). Additionally, please provide the frequency of corrections (week/month range) or identification of incorrect information (range of false hits?).

ANSWER:

Does the program use the Do Not Pay Initiative (DNP) (yes/no)	Has the DNP reduced/prevented improper payments (yes/no)	How frequently are corrections made?	How frequently is incorrect information identified?
YES	YES	Daily	Daily
YES	YES	Weekly	Monthly