REPORT TO CONGRESS:
DATA ACT
PILOT PROGRAM

OFFICE OF MANAGEMENT AND BUDGET
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I   EXECUTIVE SUMMARY

In May 2017, the Administration enabled a new view of Federal spending that for the first time, linked Federal account information to awards. This represents the successful implementation of the centerpiece of the Digital Accountability and Transparency Act of 2014 (DATA Act) (Pub. L. No. 113-101).[1] Reaching this milestone was the culmination of three years of effort by the Office of Management and Budget (OMB) and partner Federal agencies to transform the manner in which Federal financial information is provided to the public. The effort began with the standardization of key data elements shared across multiple functions, continued with the development of new linkages across government management processes, and resulted in an innovative new public display.

The authors of the DATA Act believed that the increased interoperability of financial data systems could dramatically improve the efficiency of the Federal government, and significantly reduce the financial reporting burden of grantees, contractors and other parties that partner with the government. The DATA Act tasked OMB with running a pilot to explore these possibilities by identifying common reporting elements, as well as unnecessarily duplicative or burdensome financial reporting requirements for recipients of Federal awards.

OMB divided the required pilot program into two separate work streams and oriented the pilot toward areas of opportunity identified by the procurement and financial assistance (grants) communities, respectively. The pilot was conducted in three phases: (1) a national dialogue to generate ideas from Federal award recipients, (2) development and discovery into test models for the ideas attracting the highest interest, and (3) collection of data and information for the test models.

OMB's Federal partners in conducting the pilot included the General Services Administration (GSA), the Chief Acquisition Officers Council (CAOC), the Department of Health and Human Services (HHS), and the Council on Financial Assistance Reform (COFAR). OMB provided strategic direction and leadership, with implementation managed by GSA for the procurement portion, and HHS for the grants portion.

The pilot focused on obtaining information from businesses of all sizes, as well as State, local, and tribal governments, and non-profit or non-governmental organizations. The reported aggregate dollar value of current Federal grants to recipients participating in the pilot was $122 billion.[2]

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[1] https://www.congress.gov/113/plaws/publ101/PLAW-113publ101.pdf
[2] The methodology for arriving at this figure is further explained in Appendix G.

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The objective of the procurement pilot was to explore burden reduction by building and testing an online proof of concept tool. This application would centralize collection of all reporting requirements under the Federal Acquisition Regulation (FAR), rather than require contractors to submit reports to multiple locations and in multiple formats. Contractors would now report information only once and in a single location. The procurement pilot identified five test models essential to centralized reporting and, as of the date of this report, collected information and data for three of the five identified models.

The goals of the grants pilot were to find opportunities to create new common data standards, to build tools to increase efficiencies in reporting, and to provide resources for lowering the administrative burden on awardees and the government workforce. The grants pilot identified six test models to investigate reforms and collected or analyzed data on all six.

The results of the procurement and grants test models yielded the following recommendations for further streamlining reporting:

1. Pursue further standardization of certain features, to increase opportunities to streamline reporting. Standardization of data elements, conditions, and attributes to meet the statutory, regulatory and business needs of the various communities is a prerequisite for achieving the full potential for burden reduction that data interoperability offers.
2. Seize opportunities to use information technology that can auto-populate reporting fields from existing Federal sources, since auto-population can dramatically reduce reporting burdens for Federal awardees.
3. Leverage information technology open standards to rapidly develop new tools as needs arise. Open technology standards allow for rapid development, testing and deployment of new, user-centered applications.

The table below lays out the key steps taken in the development and execution of the pilot, including outreach conducted to stakeholders and participants, development of the test models, and hypotheses and results of each test to date. While the grants pilot has concluded, the procurement pilot will continue collecting information through February 2018. OMB will amend this report should further data collection yield additional recommendations.

The procurement pilot demonstrates that burden is reduced and efficiencies are achieved when data already provided to the Federal government is re-used. The procurement pilot results also demonstrate that reporting can be streamlined when technology standards are open.

The grants test pilots demonstrate that the following conditions can reduce recipients' burden: (1) required reporting data elements are defined in a central open repository, (2) reported data is collected centrally, (3) data can be re-used and auto populated across government, and (4) available resources explain requirements and business processes where needed.

As described in OMB Memorandum M-17-22, *Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce*, President Trump wants to make the Federal government leaner, more accountable, and more efficient. The findings in this pilot illuminate the path forward for OMB and our partner agencies to build on decades of work to standardize Federal award data in a manner that will increase government efficiency, reduce reporting burdens for Federal partners, and benefit the American taxpayer.

Results Summary

Phase 1- National Dialogue	Process	Results
Open dialogue to collect ideas on questions	National Dialogue tool on www.cao.gov and https://cxo.dialogue2.cao.gov to collect ideas.	From May 2015 – May 2017, 589 participants provided 65 ideas, garnering nearly 4,000 votes. Details on questions, ideas, and votes are publicly available at the referenced links.
Phase 2 – Discovery and Development	**Process**	**Results**
Procurement	Discovery into FAR reporting requirements	Analyzed FAR, identified over 100 reporting requirements, with 40% not centralized. Matched de-centralized reporting requirements to high-impact opportunity areas from national dialogue(s)[3], selected initial pilot area to explore capability of central reporting tool.
	Discovery on current reporting processes for first test area	Discovery interviews with 30 potential users with roles including oversight, contracting officer, prime contractor, and subcontractor. Interviews resulted in categories of burden, user stories, sprint backlog, and recommendations for high-impact opportunities to ease burden. Results used to develop proof of concept reporting tool.
	Development of prototype for reporting portal	Using discovery results, developed and tested prototype of reporting tool using three of the user stories and roles from discovery.
	Test Model Development	Using input from two national dialogues, discovery, FAR analysis, and prior information technology modernization

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[3] The 2014 National Dialogue on reducing burden generated 2,039 votes on 118 ideas from 553 contractors in three weeks. The 2015-17 dialogue input from contractors referred back to the ideas from 2014 for implementation suggestions and included input from the Professional Services Council, the Coalition for Government Procurement, and individual award recipients

		efforts, developed five test models that would produce information and data to be used in developing recommendations for streamlining burden and reducing costs.
	Stakeholder Outreach	During development of prototype and proof-of-concept tool, conducted open sessions with three industry associations representing the majority of companies that would be required to report under the initial capability. The outreach aligned with the sampling plan developed for the pilot tool.
Grants	National Dialogue and Stakeholder Outreach	HHS considered the feedback provided through the National Dialogue and attended over 70 partner organization[4] events as developing the hypotheses for the pilot test models.
	Test model development	HHS leveraged community feedback from the National Dialogue and stakeholder outreach and determined that focus on data centric forms was essential to the development of the six pilot test models.
	Stakeholder Outreach	HHS developed a pilot participant sampling plan based on the statutory requirements for participants in the pilot that resulted in a minimum sample size of 42 participants per test model based on a total population of 40,070 recipients of financial assistance on USAspending.gov.
Phase 3 - Data Collection and Analysis	**Test Model - Hypothesis**	**Results**
Procurement 1	Standardize the process for submission of FAR data. A uniform and standard	Identified existing methods and processes for submitting data in initial focus area. Collection and analysis ongoing.[5]

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[4] Partner organizations are defined as a formal professional association, including grant recipients that have a direct interest in the DATA Act.

[5] Information Collection Federal Register Notice: https://www.federalregister.gov/documents/2015/11/24/2015-29896/information-collection-simplifying-federal-award-reporting and https://www.federalregister.gov/documents/2016/04/28/2016-09912/submission-for-omb-review-simplifying-federal-award-reporting.

		submission process for FAR required post-award reports will reduce contractor burden and costs.	Reporting tool information. https://interact.gsa.gov/blog/about-pilot-program
Procurement 2	Verify that FAR data standards address needs. Verification of FAR standards for post-award reporting will confirm value of existing data standards and reduce variation that will, in turn, reduce contractor burden and costs.	Confirmed that, to date, the FAR data required is needed by authorized officials. Collection and analysis ongoing.
Procurement 3	Capability to pre-populate data. If contractors do not have to report the same information to different locations then contractor burden will be reduced.	Using two data keys, successfully pre-populating data for reporting against requisite contracts by requisite contractors. Collection and analysis ongoing.
Procurement 4	Consolidate data collection and stakeholder access in a secure manner and environment. If contractors can enter FAR-required data systematically through one entry point instead of multiple different avenues and that information can be shared electronically with appropriate individuals then contractor burden will be reduced and data access improved.	Successfully built and currently iterating a proof-of-concept tool that uses authoritative log-in information for access to and from reporting. Collection, analysis, and iteration on going.
Procurement 5	Interface with other reporting systems. If interfaces can be built to support access to other reporting systems, contractor burden will be reduced.	Successfully built interfaces to authoritative sources.
Grants 1	Common Data Element Repository Library 1 - If the government provides grant recipients with definitions of data elements through CDER Library, then they will be able to accurately complete forms in a timely manner.	Respondents who had access to an online repository containing defined data standards (such as the CDER Library) were able to more accurately and quickly complete a test Information Collection Request. The CDER library containing 11,842 financial assistance reporting data elements (112 elements with standard definitions) is available to the public online at repository.USAspending.gov.

Grants 2	Common Data Element Repository Library 2 - If duplication across forms can be identified using CDER Library, then agencies can update or reduce forms to reduce grant recipient burden.	Analysis reflects that 30 out of 115 OMB-approved standard forms request the same or highly duplicative information throughout the lifecycle of an award. Within 10 notices of funding opportunities, there were 371 instances of a duplicative data element (e.g. "organization name") being required of a recipient.
Grants 3	Consolidated Federal Financial Reporting - If grant recipients can enter complete FFR information systematically through one entry point instead of multiple different avenues and that information could be shared electronically from that point forward, will reduce recipient burden and improve data accuracy.	Analysis found that allowing grantees to submit their complete FFR one-time and through a single entry point (HHS' Payment Management System), as opposed to multiple points of entry led to a reduction in burden and increase in accuracy of financial information reported. This built on the inconclusive findings from the Grants Reporting Information Project Report (GRIP) performed by the Recovery and Transparency Board.
Grants 4	Single Audit - If grant recipients do not have to report the same information on duplicative forms (Schedule of Expenditures of Federal Awards (SEFA) and Standard Form – Single Audit Collection (SF-SAC)), but rather allow information reported once to be auto-populated electronically, grant recipients' burden will be reduced.	The majority of participants responded that the new SEFA template and Federal Audit Clearinghouse (FAC) pilot reporting tool allowing one-time information entry and auto-population saves time by reducing duplicative efforts and would improve reporting accuracy.
Grants 5	Notice of Award Proof of Concept - If grant recipients have a standardized NOA for Federal awards, it will reduce grant reporting burden for recipients by standardizing access to data needed to populate information collections.	Findings reflect that recipients who were supplied with standardized NOAs, were able to more easily and accurately complete a test grant information collection tool.
Grants 6	Learn Grants - If the government supplies grant recipients with grants lifecycle information in one website, then recipients	Participants who had access to grants lifecycle information on one website were able to more accurately complete a grants knowledge quiz and reported that the information available in

| | will have increased access to grants resources and knowledge of the grants lifecycle process. | Learn Grants would be beneficial to their organization. The Learn Grants page is available to the public at https://grants.gov/web/grants/learn-grants.html. |

REPORT CONTENT AND OUTLINE

The DATA Act requires the pilot to collect sufficient data during a 12-month reporting cycle (§5(b)(3)) to inform a report to Congress. The report must include a description of the data collected under the pilot program; the usefulness of the data provided; and the cost to collect the data from recipients (§5(b)(6)(A)); and, a discussion of any legislative action required and recommendations for:

•   Consolidating aspects of Federal financial reporting to reduce the costs to recipients of Federal awards (§5(b)(6)(B)(i));

•   Automating aspects of Federal financial reporting to increase efficiency and reduce the costs to recipients of Federal awards (§5(b)(6)(B)(ii));

•   Simplifying the reporting requirements for recipients of Federal awards (§5(b)(6)(B)(iii)); and

•   Improving financial transparency (§5(b)(6)(B)(iv)).

This report presents the results of the full data collection for the grants pilot as well as the data collected to date for the procurement pilot. The data collection for the procurement pilot will continue through February 2018 to round out collection for two of the five test models. The launch of the central reporting tool was delayed due to changes in implementation partners and the need to appropriately secure the data collected. This report contains the findings and recommendations resulting from the procurement and grants pilots.

Parts I and V of this report reflect the recommendations and next steps based on the findings of both the procurement and grants pilots, recognizing the common themes identified. Part II of this report reflects that the first phase of the pilot started jointly with the start of the National Dialogue in May 2015. For readability, the specific details regarding the procurement and grants pilots are separated into Parts III and IV of this report.

II   NATIONAL DIALOGUE – Phase I

In order to develop recommendations to streamline reporting requirements and eliminate burden, OMB began by soliciting suggestions from the recipients who are required to comply with these requirements themselves.   The first phase of the pilot was the creation of an open forum that elicited ideas from all interested parties and allowed anyone to comment and vote on the ideas selected. This forum, known as "The National Dialogue to Reduce Reporting Compliance Costs," [6] opened on May 2015. The dialogue posed specific questions to current, past, and/or potential Federal contractors and grant recipients. The questions asked for information on what capabilities would be of interest in a central reporting portal, what could be done to ease reporting burden, and how current reports are provided.   The dialogue gathered 65 ideas for which nearly 600 users submitted approximately 4,000 favorable responses to pursue suggested ideas.   OMB, HHS, and GSA analyzed the ideas generated from this dialogue. In addition, OMB and GSA analyzed ideas from a previous 2014 Open Dialogue focused exclusively on contractors, to inform the test models for the DATA Act's Section 5 pilot.

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[6] cxo.dialogue2.cao.gov

III   PROCUREMENT PILOT

OVERVIEW

Since the passage of the DATA Act, OMB has made significant progress in making information about Federal awards more easily accessible and transparent to enhance both citizen access to information and to improve decision making. The DATA Act implementation not only makes it easier to understand how the Federal Government spends taxpayer dollars, but also serves as a tool for better data-centric decision-making.

Section 5 of the DATA Act requires the Federal government, among other things, to establish a pilot program with the participation of appropriate Federal agencies to facilitate the development of recommendations for the following:

- Standardized reporting elements across the Federal government (§5(b)(1)(A));
- The elimination of unnecessary duplication in financial reporting (§5(b)(1)(B)); and
- The reduction of compliance costs for recipients of Federal awards (§5(b)(1)(C)).

OMB's Office of Federal Procurement Policy (OFPP) provided strategic leadership for planning and design of the procurement pilot and collaborated with the CAOC and GSA for implementation. The objectives of the Section 5 procurement pilot were to:

- Identify recommendations from the National Dialogue for further review and testing;
- Develop a central reporting portal prototype collection tool for FAR required reports, and
- Test the portal by centrally collecting select FAR required reports that are currently reported across the Federal government, beginning with collection of reports required under FAR 22.406-6 (Payrolls and Statements).

The outcome of a central reporting portal is to streamline reporting and reduce burden by collecting all FAR required reports through one central location rather than by individual submissions to each contracting officer and multiple agencies. The report on the procurement pilot is organized as follows:

- **Section I: DATA Act Pilot Program Background and Implementation of Design –** This section starts by providing the background and context for the DATA Act procurement pilot. The section further addresses collaboration with the various implementation partners, engagement with stakeholder communities, and a detailed explanation of how the test models were developed to meet user needs.

- **Section II: Data Collected under Pilot Program to include Results and Analyses –** In accordance with Section 5 of the DATA Act, this section provides a

description of data collected under the pilot program, the usefulness of the data provided, and the cost to collect data from recipients.

- **Section III: Lessons Learned and Additional Opportunities** – In accordance with Section 5 of the DATA Act, this section provides a discussion of lessons learned up to the date of this report.

- **Appendices: Compliance with Provisions of the DATA Act** – The appendices contain overview information for activities related to the DATA Act, including mapping of activities to the statute, the outreach activities performed as part of the data analysis, pilot implementation details, and the sampling plan.

    - *Procurement Pilot Appendix B – Outreach Information:* This Appendix includes the outreach activities performed as part of the DATA Act, and the process used to determine the scope of the procurement pilot.

    - *Procurement Pilot Appendix C – DATA Act Implementation:* This Appendix includes activities taken to implement the requirements of the DATA Act specific to the Section 5 procurement pilot program.

    - *Procurement Pilot Appendix D – Sampling Plan*: This Appendix includes the sampling plan developed to meet the statutory requirements of the DATA Act.

SECTION I: DATA ACT PILOT PROGRAM BACKGROUND AND IMPLEMENTATION OF
DESIGN

The Federal procurement community, under leadership from OFPP and the CAOC, has been engaged in identifying and implementing processes and information technology changes to reduce contractor burden and streamline the Federal acquisition process. Each year, the Federal government awarded over $470B in Federal contracts to nearly 160,000 contractors. These contractors are required to provide a multitude of reports of varying complexity. Burden reduction efforts include reviewing existing regulations, policies, processes, and supporting information technology. The information technology (IT) activities focus on modernizing the central systems that support Federal contracting,[7] requiring electronic invoicing for Federal contracts in 2018,[8] and centralizing how contractors provide pre-award information.[9]

In 2014, OFPP identified a gap in the overall burden reduction approach – the lack of central collection for post-award contractor reports required under the FAR. A 2014 review of FAR reporting requirements identified over 100 FAR reporting requirements with approximately 40% of which are still decentralized and provided to multiple contracting officers across the Federal government, in multiple formats, and to multiple agencies.   Some central collection of contractor data is currently in place (e.g., Federal Funding Accountability and Transparency Act (FFATA) sub-awards,[10] FFATA executive compensation, service contract reporting,[11] and reporting of bio-preferred purchases[12]); however, these systems were not originally designed for central collection purposes and are not easily scaled to expand.

Passage of the DATA Act in 2014 introduced an opportunity to develop and pilot a proof-of-concept central reporting tool that could be used across government agencies and accessed by contractors around the globe for their respective reporting. In the first iteration of the pilot tool, the focus is on construction contractors who must comply with the FAR 24.406-6 (Payrolls and Statements). FAR 24.406-6 requires that all contractors and subcontractors performing on Federal contracts (and contractors or subcontractors performing on Federally assisted contracts) in excess of $2,000 pay their laborers and mechanics not less than the prevailing wage rates and fringe benefits. The first collection focused on construction contracts payroll information as this particular FAR reporting requirement met the criteria identified by contractors through the National Dialogue and Open Dialogue as being the most likely opportunity to reduce burden. This particular requirement is complex and development of an IT application that could meet these complex requirements could be more easily iterated to meet other reporting needs.

The potential to ease the reporting burden through this pilot for contractors complying with the Davis-Bacon Act is significant. The Federal government spends $39B a year, nearly 10% of annual procurement of goods and services, on construction. Yet the thousands of contractors who provide construction services to the Federal government must, on a weekly basis, provide each contracting

[7] http://www.gsa.gov/portal/category/21229
[8] https://www.whitehouse.gov/sites/default/files/omb/memoranda/2015/m-15-19.pdf
[9] http://www.gsa.gov/portal/category/100470
[10] FAR 52.204-10 at www.fsrs.gov
[11] FAR 52.205-15 at www.sam.gov
[12] FAR 52.223-2 at www.sam.gov

officer who manages their contract a copy of all payrolls for the preceding weekly payroll period. The information is collected across the Federal government's 3,200 separate procurement units in an inconsistent, often-paper-based, and decentralized manner. For example, if one contractor has many contracts with the Federal government, they must submit their reports to each contracting officer, each week, often in different formats and styles, re-entering similar information each time.

The pilot provides valuable information for the future inclusion of the central contractor reporting capability in the modernized Integrated Award Environment (IAE)[13] and meets the legislative requirements of the Act. Specifically, the pilot tested how to:

- Standardize reporting elements across the Federal government; (§5(b)(1)(A));
- Eliminate duplicate reporting by contractors; (§5(b)(1)(B); and
- Reduce compliance costs for contractors (§5(b)(1)(C)).

The test models in the pilot tested the concept of a central post-award reporting capability for FAR requirements as well as the IAE vision of the future that enables Federal agencies and others to develop, run, and manage award applications using IAE infrastructure, open standards, and data. Specifically, this pilot informed the overall recommendations for centralizing all FAR required reports through testing and verifying the following:

- A standardized process for submission of FAR-required data;
- The data standards in the FAR;
- An information technology capability to prepopulate data;
- Data collection and access for a variety of stakeholders in a secure manner; and
- A portal that interfaces with other reporting systems to pre-populate data already provided to the Federal government by contractors.

The data collection under the proof of concept reporting tool began in March 2017. Based on the pilot launch date, this report includes analysis of the findings and data collection from the first three phases of the pilot and for the final phase (contractor reporting) through July 2017. The contractor data collection will continue through February 2018 and, if applicable, the recommendations herein will be amended to reflect any changes based on further data collection. OFPP analyzed the data from the discovery phase, the prototype coding, and initial launch of the pilot to inform this report.

1.1 *Implementation of Design – Outreach Approaches*

The DATA Act requires efforts that facilitate the development of recommendations on eliminating unnecessary duplication in financial reporting and reducing compliance costs for Federal award recipients. To gain more insight from a broad array of stakeholders, the Chief Acquisition Officers Council, in coordination with the Federal Acquisition Regulatory Council, and OFPP conducted an open dialogue[14] from April – May 2014. The 2014 Open Dialogue was part of the overall effort to improve the economy and efficiency of the Federal acquisition system and identified impactful steps that could be taken to make it easier for agencies to do business with the best companies and enter into

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[13] http://www.gsa.gov/portal/category/21229.
[14] https://cxo.dialogue.cao.gov/ 2014 Open Dialogue on Improving How to Do Business with the Federal Government.

contracts that allow these companies to provide their best solutions for the taxpayer. The information gathered through the National Dialogue, which was launched in May 2015, included references to ideas gathered during the previous 2014Open Dialogue on reducing contractor reporting burden. The dialogue approach enables industry groups, educational groups, professional associations, small businesses, and individuals to submit ideas which can be further voted up by others.

The 2014 Open Dialogue focused on three areas for ideas related to process, policy, rule, or legislative changes that could improve the process:

- Campaign 1: Reporting and compliance requirements – The Federal government requires businesses to fill out a lot of complicated paperwork.. The questions asked centered on ideas for reengineering paperwork or systems, eliminating duplicative requirements, reducing frequency, or changing outdated requirements.
- Campaign 2: Procurement rules and practices – Focused on learning about innovative approaches to contracting that align with industry business practices.
- Campaign 3: Participation by small and minority businesses, new entrants, and non-traditional government contractors to understand what can be done to increase participation.

The Open Dialogue drew 553 users and 118 ideas which were further supported by an additional 2,039 votes. Thirty (30) percent of the votes in the dialogue were for ideas on how to reduce reporting and compliance burden. The top idea by votes was to "work with private sector/contractor base and the customer agencies to eliminate duplicative, unnecessary, and/or additional reporting requirements where the costs outweigh the benefits." A summary of the ideas and votes is included in the following table.

Idea and Comments in 2014 Dialogue	Vote Tally (Total)
Reduce duplication in reporting and data collection	166
Reduce costs for businesses required to interact with multiple systems across the Federal government	61
Create an environment where there is real time interaction for development of and responses to solicitations	20
Increase transparency of contracting opportunities and award history	12

The second National Dialogue started as part of the DATA Act pilot in May 2015. This Dialogue was designed to elicit more granular information on the 2014 Open Dialogue ideas as well as generate ideas to test as part of the DATA Act pilot. The National Dialogue provided opportunities for engagement in discussions on compliance costs and burden reduction as well as voting on the most impactful ideas. The National Dialogue drew input from the Coalition for Government Procurement, Professional Services Council, and individual award recipients.

1.2   Implementation of Design – Test Model Phases Development

OFPP reviewed the input from the National Dialogue and the Open Dialogue as well as general comments received on multiple FAR cases to develop the test models for the DATA Act pilot. OFPP also considered on-going modernization efforts in determining the scope of the pilot and developing the test models. A key component of streamlining processes to work with the Federal government is the underlying information technology (IT) that supports Federal contracting. The integrated environment that supports the Federal contracting process, the Integrated Award Environment (IAE) is currently comprised of ten systems.

The IAE systems support:

- Registration for almost 1 million contractors, grantees, and Federal officials in the System for Award Management (SAM);
- Publication of a daily average of more than 25,000 procurement opportunities, award notices, and engagement events; and
- Collection and display of over 200 standard data elements on over 2.2 million contracts awarded each year, data that are used to support DATA Act reporting, small business goal achievement, competition in Federal contracting, international trade agreements reporting, burden analysis for FAR cases, category management, forecasts of contract opportunities, and much more.

GSA is in the process of modernizing and migrating these systems into a more streamlined environment that aligns with business processes for awarding Federal tax dollars and reduces burden on contractors. The overarching vision for the IAE is to create a core infrastructure that uses open standards to support creation of additional applications that will support the Federal acquisition process and data-driven decisions. This "core-API" approach will reduce burden by eliminating duplicate data entry, duplicate log-in requirements, sharing of core information across the full environment, and centralized registration processes.

OFPP identified an additional opportunity in the overall efforts to modernize, streamline, and reduce burden – the capability for contractors to report all FAR requirements to a single location that can be accessed by all applicable users. The pilot needed to stress any IT application created by requiring it to prepopulate existing data in the IAE, collect and store data in a secure manner, provide access to data for contractors, contracting officers, oversight officials, and be able to scale to the scope necessary to work in the IAE.

The selection of the contractor reporting area to be used in piloting the prototype central reporting capability had to address, at a minimum, the majority of pain points identified by contractor feedback gathered through the 2014 Open Dialogue, June 2015 outreach session, and the 2015 National Dialogue. The selection of the payroll reporting also met the need for a complex requirement that could be used to

stress-test any new application. The reporting requirements in FAR 22.406-6 met all the criteria and were selected as the initial reporting test for the proof-of-concept tool.

The test models developed for the pilot were based on analysis of the existing centralized processes and tools in this space as well as consideration of the existing government-wide initiatives to reduce contractor burden and streamline the procurement process, the landscape, which includes:

- Integrated Award Environment – integrate 10 aging central acquisition support systems into one streamlined environment for pre and post award contract processes

- Post-award – Electronic Invoicing – agencies to move to electronic invoicing for procurement by end of FY2018, requires all solution providers to integrate with SAM.

- Primary data gap in current environment – limited central data collection for contractor post-award reporting under the FAR

- Various central data collection tools for contractors are not interfaced or integrated with GSA systems to leverage the existence of verified contractor data – requiring contractors to duplicate data that exist in one system into multiple other systems and require multiple entry points

- Case for centralized contractor post-award reporting:
    o 2014 analysis identified over 100 contractor reporting requirements in the FAR with additional requirements in agency supplements
    o Over 40% of these requirements are accomplished through decentralized reporting to individual contracting officers
    o 2014 Open Dialogue on Improving How to do Business with the Federal government (3 week dialogue, 553 registered users, 2,039 votes on 118 ideas)
    o 30% of votes in 2014 Open Dialogue were for ideas on how to reduce reporting and compliance burden
    o the number one idea by votes in the reporting and compliance area was to eliminate duplicative or unnecessary reporting requirements.

- OFPP analysis of FAR reporting requirements to prioritize candidates for the pilot included criteria that would stress test the tool by using a reporting requirement of a more complex nature to build and refine tool and be able to scale reports of less complexity:
    o Frequency of required report
    o Scope of decentralization of reporting (to two agencies, all agencies, all COs, two central points, etc.)
    o Current ongoing actions or activities to centralize (to avoid duplication of effort)
    o Level of effort for contractor to change reporting (contract changes, policy requirements, culture changes)
    o Consideration of risk level for data collection (public, potential Personally Identifiable Information (PII))
    o Scalability (ability of pilot results to inform development of central IT tool in IAE).

- Decision to initially pilot central reporting capability with Davis-Bacon payroll based on:
  - Frequency of required report (weekly)
  - Requires a recurring, affirmative submission on a regular basis
  - Davis-Bacon legislative requirement included in $39B (10%) of Federal contract obligations to over 10,800 contractors (7%) in FY2015
  - Requires building and testing interfaces with existing central systems (SAM, Federal Procurement Data System (FPDS), Wage Determination On-Line (WDOL)) for data re-use and testing ability for secure data submission in multiple formats (file upload, web entry) that would be essential capability for IAE to accommodate all business sizes and types)
  - Requires standardization of processes across Federal agencies
  - Touches on primary pain points identified in 2014 Open Dialogue.[15]

The procurement pilot focused on the fundamental building blocks necessary to scale any capability to address all FAR required reports. The proof-of-concept tool will begin by testing complex requirements such as the payroll submissions and will later be scaled to support and address current and future FAR required reports.

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[15] Future areas to be piloted meet similar requirements and fit with the same outlined test models. The second area to be tested under the central collection tool will be contractor reporting of hydrochlorofluorocarbons (HFCs).

SECTION II: DATA COLLECTED UNDER PILOT PROGRAM – TEST MODEL ANALYSES

This section of the report includes a description of the data collected under the pilot program and the usefulness of the data provided. The potential costs to collect the data from recipients (as required under DATA Act Section 5 (§5(b)(6)(A))), can be found in the Information Collection Requests.[16]

2.1   Pilot Test Model Summary

The table below summarizes the metrics collected for each test model, and subsequently, a detailed description of each test model. The test models were designed to measure burden reduction through use of a centralized FAR reporting tool and standard reporting elements.

Test Model	Test Model Title	Metric	Calculated
Create Central Reporting Portal for FAR Requirements			
1	Standardize the process for submission of FAR data	Time (in 15 minute increments) to submit report through the proof-of-concept portal compared with the submission outside of proof of concept portal, using the self-reported information from the burden questions.	Costs for report using the labor rate for a payroll analyst ($17.51) and the times to respond (through pilot vs. former way) provided by the participants.
2	Verify that FAR data standards address needs	Focus group results comparing data points identified as useful against those required under FAR.	Comparison of data points collected during focus group sessions.
Leverage Existing Systems, Reuse Data & Transition onto IAE			

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[16] Information Collection Federal Register Notice: https://www.federalregister.gov/documents/2015/11/24/2015-29896/information-collection-simplifying-federal-award-reporting and https://www.federalregister.gov/documents/2016/04/28/2016-09912/submission-for-omb-review-simplifying-federal-award-reporting.

Test Model	Test Model Title	Metric	Calculated
3	Pre-populate data	Time (in 15 minute increments) to submit report through the proof-of-concept portal and outside of proof of concept portal. Help desk metrics for error reporting.	Costs for report using the labor rate for a payroll analyst ($17.51) and the time response from the participant. Number of times errors in core prepopulated data are identified by contractors prior to being able to submit their reports.
4	Consolidate data collection and access (proof of concept)	Time (in 15 minute increments) to submit report through the proof-of-concept portal and outside of proof of concept portal. Focus group results regarding ability to easily access data as needed.	Costs for report using the labor rate for a payroll analyst ($17.51) and the times to respond (through pilot vs. former way) provided by the participants. Comparison of data points collected during focus group sessions.
5	Interface with other reporting systems	Outcome measure is interfaces work to pre-populate and share data.	Numerator: Number of fields that GSA is able to pre-populate from existing IAE systems. Denominator: Total number of fields that need to be tracked for each contract against which there is reporting.

The purpose of the pilot is to analyze the burden reduction associated with having a centralized FAR reporting tool and to determine how automating the reporting functionality contributed to burden reduction. The test models were created with the intent of meeting the DATA Act Section 5 Pilot statutory requirements and outcome goals as well as producing results that will inform recommendations and considerations for centralizing all FAR required contractor reporting. Reducing burden is an integral part of the DATA Act legislation; therefore, the test models were designed to require minimal effort on the part of the pilot participants.

2.1.1 *Pilot Test Models 1 and 2 – Create Central Reporting Portal for FAR Requirements*

The DATA Act requires recommendations related to standard reporting elements, elimination of duplicate reporting, and reduction of compliance costs ((§5(b)(1)(A),(B),(C)). To both facilitate

development of the recommendations and ascertain the feasibility of implementing changes to reporting processes, rules, and systems prior to FY2018, the central reporting test model is designed to develop and test a tool that can be used for all FAR required contractor reporting – this is reflected in test model 1 and test model 2. The test models are intended to provide insights in terms of burden reduction, a central reporting portal, and data re-population for the contractor and contracting officers involved in the pilot.

The FAR data collection proof of concept tool will identify burden reduction opportunities for Federal contractors as well as Federal officials. The tool will allow pilot participants to submit the data required on the form (OF-WH347) in FAR 52.222-8 (SF-425) in one system, rather than to multiple points across the Federal government. This will allow for a single point of data entry, create a central access point to OF-WH347 data, and allow for retrieval of the data by authorized officials (contractor and federal) for a period of time designated in policy. Additionally, the data collection tool would enable the Federal government to achieve efficiencies in submission and review processes by enabling government personnel to access the tool and its data in a secure manner from throughout agencies.

2.1.2   *Pilot Test Models 3, 4, and 5 – Leverage Existing Systems, Reuse Data, and Transition onto IAE*

The IAE modernization effort is designed to support development of third party applications that can be either incorporated or used in the IAE. The strategic vision for the IAE is to be the single point of entry for contractors and contracting professionals seeking information on procurement opportunities, awards, past performance, information to make responsibility determinations, and other acquisition information. The ability to include applications developed in accordance with IAE technical standards will reduce costs while increasing innovation and expediting delivery of new features. The Section 5 procurement pilot includes development and testing of a new user-friendly IT application that can be integrated into the future IAE to centralize all contractor reporting.

The development of a new tool into which consolidated FAR 22.406-6 data can be submitted will identify how best to leverage contract and contractor data resident in existing Federal government systems to prepopulate data, reducing potential for errors and burden. The development and piloting of the IT will also provide the opportunity to collect additional information on costs to contractors for collection as well as other IT changes that are underway or could be made to further reduce burden. The capability to prepopulate contract and contractor information to enable secure collection and storage of sensitive data is critical to building this capability in the IAE. Additionally, the tool capability must also be compatible with outside, third party existing systems that stakeholder communities may already be using for reporting.

2.2   *Pilot Test Model 1 – Standardizing FAR Data Submission*

Purpose: The DATA Act requires recommendations related to standard reporting elements, elimination of duplicate reporting, and reduction of compliance costs ((§5(b)(1)(A),(B),(C)). Based on the feedback gathered from stakeholders in the 2014 Open Dialogue, comments on the 2015 National Dialogue, and results of the tool prototype and discovery phases, there are variations in application of

FAR post-award reporting across the Federal government. Standardizing the submission process for FAR required post-award reports should reduce contractor burden associated with maintaining multiple submission procedures that may be required by various contracts.

Hypothesis 1: A uniform and standard submission process for FAR required post-award reports will reduce contractor burden and costs.

Methodology: Contractors participating in the pilot will use the proof-of-concept reporting tool to submit weekly payroll required under FAR 22.406-6 and be asked to answer two questions that will produce quantitative data related to the time required to submit the report through the portal and the time required to submit the same report under traditional methods. The respondents will be provided a drop-down menu for the time period in 15 minute increments. To calculate the cost for report submission, the labor rate estimate used in the Information Collection Request (ICR) will be the same applied to the time responses to assess the cost. The responses provided to these two questions will be compared on a monthly basis. Participants will be asked to provide qualitative responses to identify any other burden reduction efforts in the Federal government from their viewpoint. The results of this question can be used to identify either additional data sources that can be leveraged for reporting purposes or other efforts in which contractors are participating that should be considered for analysis. The information may also be used to assess variation in agency or contracting officer processes related to the proof-of-concept reporting to identify if any additional processes or practices need to be standardized.

Metrics: Time (in 15 minute increments) to submit report through proof-of-concept portal and outside of proof of concept portal, using the self-reported information from the burden questions. Calculated costs for report using the labor rate identified in the Information Collection Request and the time response from the participant. GSA is following website best practices and collecting web analytics. OFPP will review this data for additional insights about the FAR Central Reporting tool.

Summary: Contractors will be provided a test portal into which FAR required post-award reports may be submitted. The central location will create a single point of data entry and a standard submission process that will collect the data required in the report as well as supplemental data on costs and burden for submission through the portal. The submission to the portal will fulfill contractual requirements for those contracts that have been changed by agencies to require submission through the portal rather than in the traditional manner. Contractors holding multiple Federal contracts may only have some of those contract terms and conditions changed resulting in submission of reports to both the portal and continuing submission in the current de-centralized manner. Contractors will have the opportunity to provide information on other burden reduction efforts of which they are aware via a question in the portal.

2.3   *Pilot Test Model 2 – Verify that FAR data standards address needs*

Purpose: The DATA Act requires recommendations related to standard reporting elements, elimination of duplicate reporting, and reduction of compliance costs ((§5(b)(1)(A)-(C)). To facilitate development of the recommendations and ascertain if any changes are needed to existing FAR standards, feedback will be solicited from the consumers of FAR-required reports collected through the

central portal to ascertain the value of the data collected and if any changes may be recommended.

Hypothesis 1: Verification of FAR standards for post-award reporting will confirm value of existing data standards and reduce variation that will in turn reduce contractor burden and costs.

Methodology: Contractors participating in the pilot will use the proof-of-concept reporting tool to submit weekly payroll data required under FAR 22.406-6. Contractors will also be asked to answer two questions that will produce quantitative data related to the time required to submit the report through the portal and the time required to submit the same report under traditional methods. Consumers of the data will invited to participate in guided discussion sessions that will focus on the usefulness of the collected data in meeting contract management and oversight needs.

Metrics: Focus group results comparing data points identified as useful against those required under the FAR.

Summary: Contractors will be provided a test portal into which FAR required post-award reports may be submitted. Consumers of the required reports will review and use the information in contract management and oversight as appropriate. The ability to view information in an on-demand format will facilitate either verification of existing standards as meeting needs or identify potential gaps that could be improved to make the information more useful. Consumer input will be gathered through focus group (virtual and other).

2.4   *Pilot Test Model 3 – Capability to Pre-Populate Data*

Purpose: The DATA Act requires recommendations related to standard reporting elements, elimination of duplicate reporting, and reduction of compliance costs ((§5(b)(1)(A),(B),(C)). To both facilitate development of the recommendations and ascertain the feasibility of implementing changes to reporting processes, rules, and systems prior to FY18, the ability to pre-populate data from existing Federal systems must be tested and any challenges to sharing such data resolved.

Hypothesis 1: Reporting burdens on contractors will be reduced if contractors do not have to report the same information to different locations.

Methodology: The proof-of-concept reporting tool will be designed to pre-populate data from authoritative sources to reduce the amount of information that must be input by a contractor submitting a report. The core data will be pulled using key data points (unique entity identification and contract number). Contractors using the portal will be provided two questions to answer regarding time spent to report using the portal and time spent reporting without the portal. A help desk will be available to contractors using the tool and errors in core data will be able to be identified by comparing calls to the help desk or calls to the contracting officer.

Metrics: Time (in 15 minute increments) to submit report through proof-of-concept portal and outside of proof of concept portal. Calculated costs for report using the labor rate identified in the Information Collection Request and the time response from the participant. Number of times errors in core prepopulated data are identified by contractors prior to being able to submit their reports.

Summary: Data reported by contractors to various locations and/or in various formats duplicates data already available in Federal government systems. A consolidated location to report data can reduce burden and increase quality data by using verified information in other government systems to pre-populate where appropriate. For example, contractors submitting FAR-required reports should not need to provide the contractor name, address, or contract details as those are available in existing systems. A central collection portal that requires a minimum amount of information (such as a contractor unique entity identifier and a contract number) as a key to pull data from appropriate sources. This pre-population will reduce data entry and potential errors.

2.5   Pilot Test Model 4 – Consolidate Data Collection and Stakeholder Access

Purpose: The DATA Act requires recommendations related to standard reporting elements, elimination of duplicate reporting, and reduction of compliance costs ((§5(b)(1)(A),(B),(C)). To both facilitate development of the recommendations and ascertain the feasibility of implementing changes to reporting processes, rules, and systems prior to FY2018, the consolidated data collection and access test model will test a proof-of-concept tool that can be used for all FAR required contractor post-award reporting.

Hypothesis 1: Reporting burdens on contractors will be reduced and data access will improve, if contractors can enter FAR-required reporting data systematically through one entry point instead of multiple different avenues and that information can be shared electronically with appropriate individuals.

Methodology: Contractors participating in the pilot will use the proof-of-concept reporting tool to submit weekly payroll required under FAR 22.406-6 and be asked to answer two questions that will produce quantitative data related to the time required to submit the report through the portal and the time required to submit the same report under traditional methods. The respondents will be provided a drop-down menu for the time period in 15 minute increments. To calculate the cost for report submission, the labor rate estimate used in the ICR will be the same applied to the time responses to assess the cost. The responses provided to these two questions will be compared on a monthly basis. Participants will be asked to provide qualitative responses to identify any other burden reduction efforts in the Federal government from their viewpoint. The results of this question can be used to identify either additional data sources that can be leveraged for reporting purposes or other efforts in which contractors are participating that should be considered for analysis. The information may also be used to assess variation in agency or contracting officer processes related to the proof-of-concept reporting to identify if any additional processes or practices need to be standardized. Consumers of the data will invited to participate in guided discussions that will focus on the usefulness of the collected data in meeting contract management and oversight needs.

Metrics: Time (in 15 minute increments) to submit report through proof-of-concept portal and outside of proof of concept portal. Calculated costs for report using the labor rate identified in the ICR and the time response from the participant. Focus group results regarding ability to easily access data as needed.

Summary: The consolidated data collection and access model will identify reductions in burden for both contractors and Federal government officials that need to use the data in contract performance and/or oversight. The consolidated data collection tool will allow for a single point of entry to streamline reporting using electronic submission and authentication, eliminating multiple submission points and paper formats. OFPP considered and researched various FAR required reports that could be used to test this and all the other models and confirmed that the FAR required report under FAR 22.406-6 is best suited to test the proof-of-concept.

2.6   Pilot Test Model 5 – Interface with Other Reporting Systems

Purpose: The DATA Act requires recommendations related to standard reporting elements, elimination of duplicate reporting, and reduction of compliance costs ((§5(b)(1)(A),(B),(C)). To both facilitate development of the recommendations and ascertain the feasibility of implementing changes to reporting processes, rules, and systems prior to FY2018, the test model for interfacing with other reporting systems is included in the procurement pilot.

Hypothesis 1: Reporting burdens on contractors will be reduced if interfaces can be built to support access to other reporting systems.

Methodology: The proof-of-concept reporting tool will be designed with the technical ability to access and share data across other existing applications. The interfaces will be used in pre-population and designed to be tested (at a future point once pilot is well-underway) using other existing IT applications that collect and store data from contractors.

Metrics: Outcome measure is interfaces work to pre-populate and share data (where numerator is the number of fields that GSA is able to pre-populate from existing IAE systems and the denominator is the total number of fields that need to be tracked for each contract against which there is reporting). Currently, the central reporting tool has the feature ability to pre-populate 22 out of 26 records.

Summary: Data about businesses is collected and stored in various systems across the Federal government. Some of these businesses hold Federal contracts and are also required to report under those contracts. In some cases, data collection is duplicated and this duplication could be eliminated by creating interfaces to appropriate sources. During implementation of various FAR cases, data relevant to the cases were identified as residing in different systems across the Federal government. However, these data were not all available using the same data key nor were all the systems interfaced to support access to and from the various sources. Steps taken to address this gap included requirement of a standard key to identify the data and building interfaces to appropriately share the data. This test model seeks to test the capability for the proof-of-concept reporting tool to be able to interface with all other relevant systems to share appropriate data and reduce reporting burden.

SECTION III: LESSONS LEARNED AND ADDITIONAL OPPORTUNITIES

OFPP and GSA captured the following lessons learned associated with the implementation of the Section 5 procurement pilot. These include lessons learned across the three phases of the pilot and address themes related to data standards, communication and stakeholder management, project management, and privacy and security considerations.

Topic	Lesson Learned
No uniformity or standardization of reporting at sub-contractor level	During discovery interviews, subcontractors identified that prime contractors require reporting in different ways, creating confusion as to what is required reporting pursuant to the FAR.
Privacy considerations	Early identification of data as personally identifiable information (PII) is crucial to having the necessary approvals or people engaged. This could include completing a Privacy Impact Assessment (PIA), and a System of Record Notification (SORN).
Requirements development	Communication and engagement of subject matter experts early and often in sprint planning is key to building good user stories (requirements) and clarifying the user stories with the developers. Assign a product owner familiar with the business rules.
Leverage existing environments or platforms	Leveraging existing platforms enables new applications to inherit security controls or use development tools associated with the platform, which in turn can make transition into existing systems, such as IAE, easier. Using the IAE authentication services across the Federal government for web based applications that are required use for contractors will result in cost savings and burden reduction.
Outreach to stakeholders	Communication with and learning from the stakeholder community, in this case CO's and contractors, who will use a new application helps to prepare the community for change associated with IT modernization.

Topic	Lesson Learned
Prioritize requirements based on burden reduction analysis	Actively engage the Product Owner in determining the Minimum Viable Product (MVP), so that major functionality is included in initial launch (for instance, being able to upload a CSV file wasn't originally included in MVP for the initial launch of the procurement pilot)
Rely on shared assets	Leverage shared and existing IT services, such as authentication, when available, so that re-building functionality is not necessary. This also reduces burden and saves resources.
Scalability	Outline early on the parameters to test the application's scalability, with functionality from both ends of the spectrum (complex and simple) to ensure that the application can scale to multiple reporting requirements.
SORN (government-wide)	Build time into the schedule to allow for comment period for a government-wide SORN, which are not that common. Agencies need time on both the subject matter and privacy sides for review and comment, as well as disposition of comments.
Current culture change	Consider current, existing structure of use and participants apprehension in using new process. Participants need to be informed on how new tool and process reduces burden and time spent on compliance exercises.

IV   FINANCIAL ASSISTANCE (GRANTS) PILOT

OVERVIEW

The Federal government outlays approximately $700 billion in grants annually, accounting for nearly 20 percent of the Federal budget and approximately 1,800 different types of grant opportunities listed in the Catalog of Federal Domestic Assistance (CFDA). Federal grants support the public good and allows Federal agencies to execute their programmatic missions. OMB estimates that there are more than 40,000 grant recipients who receive Federal funding each year. For states and universities, Federal financial assistance accounts for approximately a quarter and a third of their state and university budgets respectively. Other recipient types include non-profits, tribes, local governments, and small businesses.

Recent accomplishments of the Federal financial assistance community, under leadership from OMB's Office of Federal Financial Management (OFFM) and the former Council on Financial Assistance Reform (COFAR), have largely focused on streamlining and improving government-wide grants guidance leading to the issuance of the Uniform Guidance in December 2013. This reform targeted financial risks and better directed resources to achieve evidence-based outcomes. The adoption of the guidance eliminated duplicative and conflicting guidance by combining eight separate OFFM circulars and relocating Federal awarding agency implementation of OFFM guidance to one location in Title 2 of the Code of Federal Regulations. When 28 Federal awarding agencies adopted the guidance in December 2014, this action translated into a 75% reduction in financial management regulations for Federal financial assistance awards.

Despite the success of the Uniform Guidance, the Federal and recipient community alike continually express frustration over the burden associated with managing awards. The Government Accountability Office (GAO) recently highlighted the need to address additional opportunities to reduce recipient burden[17]. The passage of the DATA Act provided the chance identify additional opportunities to reduce recipient burden and simplify reporting.

In 2014, OFFM designated HHS as the executing agent of the grants track of the pilot. HHS was uniquely qualified to execute the grants track of the pilot due to its status as:

1. The largest grant-issuing entity in dollars within the Federal government;
2. The managing partner of Grants.gov,[18] which is the Federal government's portal for the public to find and apply for Federal grants, providing broad visibility into the spectrum of Federal grants, and;
3. The administrator and operator of the Payment Management System,[19] which makes grant payments for 12 Federal entities and approximately 77 percent of all dollars in Federal civilian grant payments.

HHS created the DATA Act Program Management Office (DAP) in November 2014 to achieve Department-wide compliance and lead the grants track of the Pilot in accordance with the DATA Act. DAP reports to the HHS Assistant Secretary for Financial Resources (ASFR) and operates three portfolios: Intergovernmental and Public Engagement, Implementation and Integration, and

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[17] http://www.gao.gov/products/GAO-16-573
[18] www.grants.gov/
[19] www.dpm.psc.gov/access_pms/system_status.aspx

Management and Operations. The Intergovernmental and Public Engagement portfolio designed and executed the pilot as the executing agent on behalf of OFFM.

HHS's role as the executing agent of the pilot involved the design of a holistic framework that guided the approach to grant recipient input collection; the performance of tests on existing processes, systems, and tools; and the delivery of recommendations to OFFM.

The grants pilot report is organized as follows:

- **Section I: Grants Pilot Program Background and Implementation of Design** – This section starts by providing the background and context for the DATA Act grants pilot. The section further addresses collaboration with the various implementation partners, engagement with stakeholder communities, and a detailed explanation of how the test models were developed to meet stakeholder needs.

- **Section II: Data Collected under Grants Pilot to include Results and Analyses** – In accordance with Section 5 of the DATA Act, this section provides a description of the data collected under the grants pilot program, an analysis of the data, and conclusions that may be drawn.

- **Section III: Lessons Learned and Additional Opportunities** – In accordance with Section 5 of the DATA Act, this section provides a discussion of lessons learned up to the date of this report.

- **Appendices:** The appendices contain overview information for activities related to the grants pilot, including the outreach activities performed as part of the data analysis, pilot implementation details, and the sampling plan.

    - *Appendix E: Grants Pilot Table of Figures*
    - *Appendix F: Grants Pilot Cost Estimate*
    - *Appendix G: Grants Pilot Sampling Plan and Execution*
    - *Appendix H: Grants Pilot Participants*
    - *Appendix I: Grant Reporting and Information Project (GRIP) Report*

SECTION I: GRANTS PILOT PROGRAM BACKGROUND AND IMPLEMENTATION OF DESIGN

Grants Pilot Framework

The pilot framework (see Figure 1 entitled *Grants Pilot Framework*) was leveraged as the strategic approach to the pilot's design and execution. HHS collected stakeholder feedback and considered a data centric approach when developing each of the pilot test models. OFFM concurred with the HHS-developed framework in the fall of 2015.

Figure 1: Grants Pilot Framework
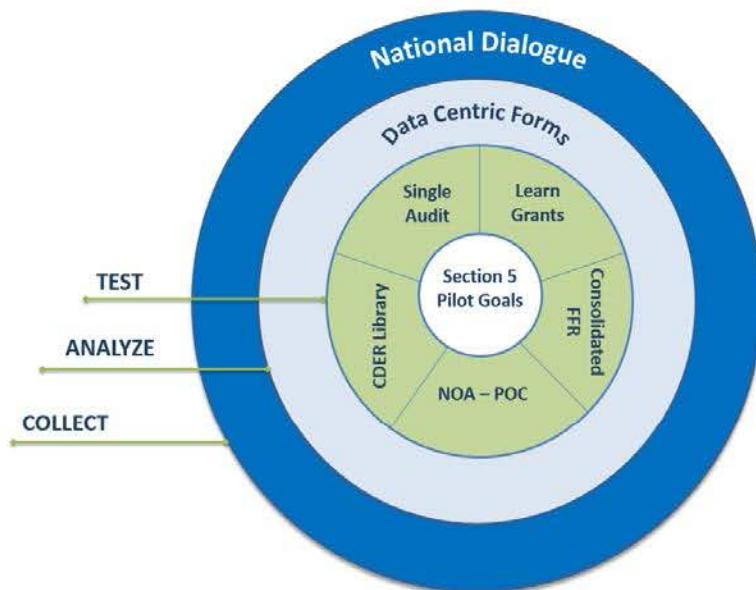
1.1   National Dialogue and Stakeholder Outreach

As previously described, the National Dialogue[20] is managed by OMB as part of an effort to improve the economy and efficiency of the Federal procurement and grant award-making processes.

Several National Dialogue topics included discussion on burden placed on grant recipients due to duplicate reporting requirements. For example, one comment related to the Single Audit process and forms, and the additional steps required between the Single Audit Data Collection Form (SF-SAC) and the Schedule of Expenditures of Federal Awards (SEFA).[21] HHS considered this and similar comments in the National Dialogue when developing the Single Audit test model.

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[20] cxo.dialogue2.cao.gov

[21] "Currently, the submission to the Federal Audit Clearinghouse requires a PDF file (Single Audit Reporting Package/Audit Report Package) in addition to some of the same data provided in Form SF-SAC. Since all of the components of the Single Audit Reporting Package are posted on websites, I suggest we provide links to these documents rather than create a PDF of all of the documents. In addition, the format we use for our printed report is different than the format for Form SF-SAC, and

An additional example in the National Dialogue included a comment emphasizing inconsistencies of terms and definitions among Federal agencies. HHS considered this in developing the Common Data Element Repository (CDER) Library test model. In addition to National Dialogue comments, HHS involved numerous and diverse partner organizations, representing grant recipients, to formulate pilot test models.

Beginning in November 2014, HHS attended partner organization events to discuss the pilot and solicit test model feedback.[22] Concurrently, HHS established an e-mail account[23] that was monitored daily to encourage two-way communication with stakeholders. Between November 2014 and December 2015, HHS attended approximately 70 partner organization events, representing over 14,000 members. HHS's outreach included the following partner organizations:

- American Council for Technology-Industry Advisory Council (ACT-IAC)
- American Institute of Certified Public Accountants (AICPA)
- Association of Government Accountants (AGA)
- Data Transparency Coalition (DTC) – transitioned to the Data Coalition in 2016
- Federal Demonstration Partnership (FDP)
- National Grants Management Association (NGMA)
- Aspen Institute/Independent Sector

HHS used input received from these partner organizations in developing the hypotheses for the pilot test models.

1.2   Data Centric Forms

HHS leveraged community feedback from the National Dialogue and stakeholder outreach and determined that a focus on data centric forms was essential to the development of the pilot test models. HHS defines data centric as:
- The method in which data is captured and transferred through the use of a form between grant recipients and government agencies, and
- What specific data is recorded on forms, and used by grant recipients and/or government agencies.

This data centric approach was applied in the development of the pilot test models in the following ways:
- The two CDER Library test models examined how a single access point that clearly defines data elements currently used on forms could affect the grant recipient community.
- The Consolidated Federal Financial Report (CFFR) test model examined the process by which grant recipients transfer data related to the financial status of a grant to the government via a single entry point. This process ensures submissions are accurate and complete.
- The Single Audit test model examined streamlining the transfer of data required under the Single Audit Act from the grant recipient to the Federal government through a template process of standardized data elements.

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this requires additional steps to convert/combine/summarize data. I do appreciate the new process for populating Form SF-SAC these past two years. The upload/download features work great and are easy to use!"

[22] HHS defines a partner organization as a formal professional association, which includes grant recipients, who have a direct interest in the DATA Act.

[23] DATAActPMO@hhs.gov

- The NOA-POC test model examined the effects of standardized form structure and data elements for grant recipients.

1.3 Pilot Test Models Development and Approval

The grants pilot framework was comprised of six pilot test models, which were developed to fulfill specific statutory requirements provided in the DATA Act. The hypotheses associated with each pilot test model were presented to OFFM on September 23, 2015.

The six pilot test models (further described in Section II: "Data Collected Under Grants Pilot and Analysis" are the following:
1. Common Data Elements Repository (CDER) Library 1
2. CDER Library 2
3. Consolidated Federal Financial Report (CFFR)
4. Single Audit
5. Notice of Award-Proof of Concept (NOA-POC)
6. Learn Grants

In October 2015, OFFM approved the framework for the pilot test models, including the planned use of tools and technologies during execution.

1.4 Project Plan

HHS created a project plan to effectively manage, track, and report pilot progress. The project plan contained details of the pilot's governance structure, framework, and grant recipient outreach. The focus of the project plan was to identify the approach and activities necessary to execute each pilot test model.

A summary of the phases discussed in the project plan is shown below:

Figure 2: Project Plan Phases

Plan & Design → Collect & Analyze Data → Report

FY 2015 → FY 2016 → FY 2017

Plan and Design (November 2014 - March 2016)
The first phase of the pilot implementation began following the passage of the DATA Act. During this phase, HHS created a project plan. In this phase, HHS also launched the CDER Library and expanded the Learn Grants tab on Grants.gov - both of these tools are discussed in detail in subsequent report sections. In addition, HHS initiated stakeholder outreach efforts, and OFFM launched the National Dialogue to obtain grant recipient feedback on various topics associated with reporting and administrative burden. Lastly, HHS vetted the pilot test model execution approach with the grant recipient community through town hall meetings and the design and effectiveness pretest meeting.

<u>Data Collection and Analysis</u> (March 2016 - May 2017)
Through the pilot, HHS collected and analyzed data over a 12-month reporting period as required by the DATA Act legislation. During this phase, HHS complied with the Paperwork Reduction Act (PRA) (referenced in Appendix G: Grants Pilot Sampling Plan and Execution) and executed pilot test models. Several pilot test models, such as NOA-POC, Learn Grants, and Single Audit were executed at partner organization events.

<u>Report</u> (September 2016 - August 2017)
This phase of the pilot program included the development of recommendations based on data collected and analyzed. HHS submitted draft report sections to OFFM for inclusion in the required report to Congress.

1.5   *Public Communication*

After concurring on the pilot test models in October 2015, OFFM and HHS refined the communication strategy to broaden the audience to include grant recipients who were not part of any partner organization. The communication strategy objectives included maintaining awareness of the pilot, describing the pilot test models, and broadly recruiting test model participants through directed outreach.

HHS used various OFFM-approved communication methods to support this strategy. One method was to continue HHS's attendance at stakeholder events. HHS also provided written communications such as fact sheets to partner organizations, stakeholders, and later pilot participants. One other communication method used was social media to reach a broad and diverse group of grant recipients.

On December 17, 2015, HHS launched a website[24] to provide the public with an online point of reference that includes background on HHS and the DATA Act, information about the pilot test models and how to participate, updates on HHS outreach events, and HHS contact information. In January 2016, HHS began to distribute monthly newsletters to keep the public apprised of the actions surrounding the pilot. An HHS Twitter[25] account was also established on February 2, 2016, as a mechanism to distribute information and maintain awareness on pilot activities.

HHS measured the effectiveness of its communications by monitoring specific metrics related to outreach. The various communication platforms and associated metrics are outlined below in Figure 3: Social Media Goals and Metrics.

Figure 3: Social Media Goals and Metrics

HHS Communications	Launch Date	Goal	Metrics
Fact Sheets	September 3, 2015	To inform the public on pilot test models and encourage participation.	Number of requests for pilot information received via email or at partner organization events.
Website	December 17, 2015	To provide the public with an online point of reference that includes background on HHS	*Page views* (an instance of an Internet user visiting a particular page on a website); *Unique page*

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[24] www.hhs.gov/about/agencies/asfr/data-act-program-management-office/
[25] twitter.com/HHS_DAP

		DAP and the DATA Act, information about the pilot test models and ways to participate, updates on HHS DAP's outreach events, and HHS DAP contact information.	*views* (the number of individual visitors who have looked at pages. Repeat viewers are only counted once. Unique page views is a subset of total page views); *Average time on page* (average time on page reported in seconds); *Entrances* (number of entries by visitors into the pages of the website); and *Bounce rate* (number of single-page visits by visitors of website).
Newsletter	January 1, 2016	To keep HHS stakeholders aware of HHS DATA Act implementation and pilot activities.	The number of times the newsletter was *opened* and the number of *clicks* on links provided within the newsletter.
Twitter	February 2, 2016	To distribute information on and maintain awareness of pilot activities to various stakeholders. To encourage participation in pilot test models.	*Engagement* (Total number of times a user has interacted with a tweet. This includes all clicks anywhere on the tweet (including hashtags, links, avatar, username, and tweet expansion), retweets, replies, follows, likes, and detail expands); and *Impressions* (A measure of exposure, which means a tweet has been delivered to the Twitter stream of a particular account. The potential number of times users saw the tweet on Twitter)

HHS analyzed monthly statistics to ascertain the effectiveness of each platform and modified its messages accordingly in an attempt to educate the public on the pilot, the test models, and most importantly to obtain participants.

1.6   *Pilot Test Model Refinement*

During the plan and design phase of the pilot, HHS consulted with various partner organizations to refine the test model execution steps and activities. During this phase, HHS met with Federal grant professionals, grant-focused partner organizations, and grant recipients to solicit feedback for specific execution methodologies, survey questions, and timeframes.

Subject Matter Expert (SME) Meetings
Through the development of the pilot test models, nine meetings were held with Federal subject matter experts (SMEs) to discuss what data should be tested and how each pilot test model could influence current data collection practices in the Federal grants community. These meetings began in November 2015 and concluded in February 2016. Feedback received at these meetings influenced the pilot test

model forms and quizzes. There were two meetings for most pilot test models, with the purpose of gathering input on how to best implement the pilot test models.

Town Hall Meetings with Partner Organization Representatives
Prior to the executions of the pilot test models, HHS held town hall meetings to inform stakeholders of upcoming pilot activities, and describe the test models in detail. Partner organizations that attended these town hall meetings included the ACT-IAC, AGA, AICPA, DTC, FDP, and NGMA.

Pre-Test Meeting with Grant Community Members
HHS hosted a pre-test meeting that included representatives from OFFM, universities, other grant community members, and a grants management software company. The purpose of this meeting was to discuss and solicit input on the implementation of each test model.

Meeting participants made recommendations related to:
1. The ability of the test models to meet requirements defined within the DATA Act;
2. The validation that the test models were relevant to the needs of grant recipients;
3. Specific forms, processes, and systems that could be used in each pilot test model;
4. How to increase pilot test model participants;
5. Which types of grant recipients to target for each pilot test model; and
6. How to keep the Federal grants community, including these pre-test volunteers, informed of pilot test model progress and updates.

SECTION II: DATA COLLECTED UNDER GRANTS PILOT AND ANALYSIS

This section of the report includes a description of the data collected under the grants pilot program, an analysis of the data, and conclusions that may be drawn. More information regarding the pilot execution methodology, including the sampling plan, is available in Appendix G: Grants Pilot Sampling Plan and Execution and detailed pilot participants for each test model is available in Appendix H: Grants Pilot Participants.

2.1 Common Data Element Repository (CDER) Library 1

CDER Library 1	
Referenced Legislation	DATA Act (§5(b)(1)(A))
Purpose	The DATA Act requires efforts to facilitate the development of recommendations for standardized reporting elements across the Federal government. The CDER Library is a repository for common data elements to facilitate consistency of Federal terminology focused on financial assistance terms and definitions. The pilot tested the CDER Library's ability to potentially reduce burden by providing an easy-to-use reference point for standard terminology.
Hypothesis	If grant recipients are provided with definitions of data elements through CDER Library, then they will be able to accurately complete forms in a timely manner.
Test Model Approach	HHS created a scenario based on the grants lifecycle. In this scenario, a fictitious grant award was presented to the participants. After reading the scenario, participants were asked to complete a Data Collection Tool (DCT) that was created to model an Information Collection Request with grants-focused data elements. Participants were divided into two groups (Group A and Group B). Group A was given access to the CDER Library for assistance to standardized terms and Group B was permitted to use all other available sources to complete the DCT. After participants submitted their DCTs, they submitted a survey that captured feedback on whether the repository assisted Group A or could have assisted Group B in required grant reporting. HHS analyzed and compared DCTs from both groups for accuracy and completeness of captured data in a controlled period of time.

CDER Library 1 Results and Analysis

In evaluating the results for CDER Library 1, two themes emerged: (1) burden and time, and (2) usefulness and accuracy. Participants viewed the CDER Library positively, with the majority believing that it would save them time during the completion of grant lifecycle forms. Although this test model did not utilize a pre-existing OMB-approved Information Collection Request and there are limitations to conclusions that may be drawn, the survey responses point to inconsistent data definitions in OMB-

approved forms and participants see the utility in utilizing an online repository containing defined data standards (such as the CDER library) for improved data accuracy.

Results showed that participants with access to the CDER Library scored higher on the DCT, and completed the DCT in less time than participants who were instructed to use other available sources without access to a designated alternative tool, such as the CDER Library. The pilot did not test the usefulness of the CDER library in completing any OMB-approved information collections that are currently in use. It also did not compare the usefulness of the CDER library to other existing sources of information about the definitions of standardized data elements, such as the instructions that typically come with forms, or the OMB Uniform Guidance in 2 CFR Part 200.

- **Burden and Time** – The test model evaluated burden by looking at the time it took participants to complete the DCT, which modeled a grant lifecycle form. The majority of participants responded in their surveys that they believe an online repository containing defined data standards (such as the CDER library) would reduce the amount of time spent on completing grant lifecycle forms, which directly relates to the objective of reducing reporting burden.
- **Usefulness and Accuracy** – Survey responses noted that the majority of participants encountered varying data element definitions across multiple grant lifecycle forms and majority of participants indicated that an online repository containing defined data standards (such as the CDER Library) would allow them to more accurately report information when completing Information Collection Requests.
  - On average, the participants in Group A completed the DCT with higher accuracy than participants in Group B.
- **Participant Feedback** – While most participants concluded that the CDER Library was a helpful resource for grant recipients, they also provided suggestions for improving the CDER Library. One participant noted:

  "This was my first exposure to the CDER Library. I went to the website but could not find the information to answer the questions. I would need some training to help me to navigate the site."

Many recommendations mentioned the need for the Federal government to agree on common data standards and consider publishing these standards in the CDER Library. In addition, some participants suggested that it would be useful for online grant forms to have a link to the CDER Library, allowing grant recipients direct access to defined data standards. This suggestion is similar to the features found in current Information Collection Requests where additional information pops up when a respondent hovers over a field. Participants commented that the CDER Library provided clear, searchable definitions for the data standards presented in the DCT.

CDER Library I Conclusion

The CDER Library 1 results reflect that those respondents who had access to an online repository containing defined data standards, such as the CDER Library, may complete information requests more accurately and quickly. While this pilot did not develop standard definitions for any elements, stakeholder feedback indicated that if Federal agencies further standardize and adopt common data elements for Information Collection Requests across various programs and funding opportunities, and make standard definitions for these elements easily accessible, then recipients may be able to complete reporting in a more accurate and timely fashion. To the extent that duplicative data element definitions are codified in statute, future legislative efforts may also benefit from consulting a repository of existing standard financial assistance definitions. OFFM will continue to coordinate with agencies in the development of common data standards and resources to make such standards easily accessible to grant applicants and recipients.

2.2   Common Data Element Repository (CDER) Library 2

CDER Library 2	
Referenced Legislation	DATA Act (§5(b)(1)(B)), DATA Act (§5(b)(1)(C))
Purpose	The DATA Act requires efforts to facilitate recommendations for the elimination of unnecessary duplication in financial assistance reporting. The CDER Library was designed to identify duplication of data within existing grant forms in an effort to reduce grant recipient burden. This Model tested the CDER Library for its utility to identify duplicative elements across various grant forms.
Hypothesis	If duplication across forms can be identified using CDER Library, then agencies can update or reduce forms to reduce grant recipient burden.
Test Model Approach	HHS conducted an internal analysis, and therefore did not use participants for this pilot test model. Duplicative data elements were identified within the SF-424 form families.[26] HHS analyzed the SF-424 form families to identify duplicative data elements within the SF-424 form families and across Federal entities. Additionally, HHS reviewed forms across the grants lifecycle that revealed redundant data elements.

CDER Library 2 Results and Analysis

In evaluating the results for CDER Library 2, two themes emerged from the results: (1) identification of duplication, and (2) pre through post award consistency.

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[26] The SF-424 form families represent the government-wide standard data sets and forms for grant application packages, which were developed in partnership with Federal grant-making entities and the applicant community. There are many forms in this group. Additionally, other Federal entities have created their own unique SF-424 forms. These forms represent a large portion of the pre-award process.

- **Identification of Duplication** – Although the CDER Library 2 test model analyses only covered a subset of award forms, the review revealed that opportunities exist to either update or reduce forms to reduce burden for all stakeholders.
  - Based on the initial analysis of 115 SF-424 forms, 30 out of 115 (26%) forms were identified as being highly duplicative[27] (Analysis 1).
    - Of those 30 forms, 15 forms contain the exact same set of data elements as at least one other form.
  - Instances of potentially duplicate data elements were present within all of the notice of funding opportunity application packages analyzed by HHS (Analysis 2).
    - Within the ten notice of funding opportunities, there were in aggregate 371 instances of the appearance of a duplicative data element within an individual notice of funding opportunity. For example, one agency specific notice of funding opportunity, grant recipients are required to provide their "Organization Name" on the following five forms:

Figure 4: Forms Contained Within One Agency Specific Notice of Funding Opportunity Requiring "Organization Name" Data Element

Application for Federal Assistance (SF-424)
Project/Performance Site Location(s) (OMB 4040-0010)
Certification Regarding Lobbying
Assurances for Non Construction Forms (OMB 4040-0007)
Key Contacts (OMB 4040- 0010)

  - HHS identified nine data elements that were duplicated in at least two of the ten analyzed notice of funding opportunity packages (Analysis 3). A summary of these data elements is found in Figure 5 below:

Figure 5: Potentially Duplicate Data Elements across NOFAs

Data Element	Number of NOFAs Out of Ten Containing Data Element Duplication
Descriptive Title of Project	2
Principal Investigator	2
Federal Department/Agency	3
Organization DUNS	3
Award Amount Information	4
Organization Location	5
CFDA Number	6
Authorized Representative Contact Information	8
Organization Name	9

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[27] Having a match percentage of 50% or above.

- **Pre-award through Post-award Consistency** – The use of a common data element from pre-award through post-award is limited to static information such as name, address, place of performance, etc. and varies by agency. There is currently no mechanism for ensuring data element consistency from pre-award through post-award Information Collection Requests, and no means of storing consistent data captured by Information Collection Requests (Analysis 4).
  - HHS identified the following seven duplicative data elements collected independently on the SF-424 and SF-425:

Figure 6: Data Element Duplication between SF-424 and SF-425

Organization Name
Authorized Representative Contact Information
Organization Location
Federal Award Identifier
Organization DUNS
Organization Employer Identification Number (EIN)
Federal Department/Agency

- **Participant Feedback** – The CDER Library 2 test model identified areas of duplication in Federal government information collection requests based on the information in CDER Library.

CDER Library 2 Conclusion

The SF-424 and notice of funding opportunity analyses conducted under the CDER Library 2 test model were initial attempts to identify duplication within and across grant funding opportunities. These analyses should form the basis for future efforts to identify and reduce duplication across a broader array of data elements and Information Collection Requests to more efficiently reduce grant recipient burden. Additional Information Collection Requests and data elements can be entered into an online repository containing defined data standards (such as the CDER Library) to facilitate these additional analyses and effectively identify data element duplication and identify when information collected for one purpose may be reused on other Information Collection Requests. OFFM notes that in the three years since the pilot began, technology has evolved to the point that duplication in some cases indicates a level of standardization which may be not alone be a source of burden. OFFM will continue to work with agencies to streamline Information Collection Requests as appropriate. OFFM will also work with HHS and other grant-making agencies to automate and digitize grants applications and reporting, taking a data-centric approach, which could eliminate burden associated with duplicative forms.

2.3   Consolidated Federal Financial Report (CFFR)

CFFR	
Referenced Legislation	DATA Act (§5(b)(1)(C))

Purpose	Grant recipients are required to fill out the Federal Financial Report (FFR) (SF-425) and submit the form to their grant-awarding agency. The FFR is a common Information Collection Request of grant recipient expenditures for a particular time period that was designed to replace and consolidate two previous Information Collection Requests, the Financial Status Report and Federal Cash Transactions Report. Inconsistent with the intent of the FFR, many agencies continue to require grant recipients to submit different portions of their FFR through multiple entry points in different formats/systems. The Consolidated FFR (CFFR) pilot test model is a potential process improvement to allow grant recipients to submit the FFR form (SF-425) in one system, rather than in multiple entry formats/systems. This model allowed for a single point of data entry, application of system edits to validate FFR data, and a potential future streamlining of the close-out process, which could result in reduced grant recipient reporting burden. The CFFR pilot test model also builds on an inconclusive finding in the Grant Reporting Information Project Report (GRIP) performed by the Recovery and Transparency Board under Federal Funding Accountability and Transparency Act, which recommended a consolidated financial grant reporting system.
Hypothesis	If grant recipients can enter complete FFR information systematically through one entry point instead of multiple different avenues and that information could be shared electronically from that point forward, then grant recipient burden will be reduced and data accuracy will be improved.
Test Model Approach	HHS created the CFFR test model to determine whether grant recipients' FFR information entered via a single entry point could reduce grant recipient burden and improve data accuracy. After participants submit their FFR, they completed a survey. The survey contained questions regarding whether the single entry point could reduce reporting burden. This pilot test model was conducted by: • Obtaining feedback through surveys on the process from HHS's Administration for Children and Families (ACF) grant recipients who submitted four quarters of FFR data through the HHS Payment Management System (PMS) (ACF Pilot), and • Describing the test model reporting process to a live audience (facilitated discussion) who completed surveys on their perception of the process described.

CFFR Results and Analysis

The purpose of this test model was to assess the effectiveness of submitting the complete FFR through a singular system, in this case PMS. The test model revealed three themes (1) burden and time, (2) usefulness and accuracy, and (3) reconciliation process. The results indicated that the majority of

participants saw the benefits of submitting through one system as opposed to multiple different avenues. Participants indicated that submitting a complete FFR through one system, PMS, would allow for a reduction in time and burden, and increase the accuracy of information they provided to the Federal government. The majority of participants stated that the most significant benefit of submitting the complete FFR through a single entry point was the elimination of submitting duplicative information through multiple systems.

- **Burden and Time** – The majority of participants noted that submitting the complete FFR through PMS allowed for time savings during the reporting process and reduced the associated burden. A majority of participants also noted that submitting the complete FFR through a single entry point would allow for increased reporting efficiencies.
- **Usefulness and Accuracy** – The majority of participants indicated that the accuracy of financial data would improve with the submission of the complete FFR through a single entry point.
- **Reconciliation Process** – The majority of participant agreed or strongly agreed that the reconciliation process between payments received and expenses reported would improve with the submission of the complete FFR through a single entry point.
- **Participant Feedback** – Participant feedback was not solicited for this test model regarding potential for test model subject improvement.

CFFR Conclusion

Originally created to eliminate burden by consolidating two Information Collection Requests into one, the implementation of the FFR demonstrates the importance of standardizing the process in which Federal agencies collect information is as important as data standardization. If grantees are able to submit their complete FFR one-time and through a single entry point, then they will have increased reporting accuracy and a reduction in FFR submission time, thereby reducing overall grantee reporting burden. OFFM will work with Federal agencies to explore opportunities to streamline financial reporting for their grant recipients.

2.4 Single Audit

Single Audit	
Referenced Legislation	DATA Act (§5(b)(1)(B)), DATA Act (§5(b)(1)(C))
Purpose	A Single Audit is a financial statement and Federal awards audit or examination for entities that expend $750,000 or more in Federal funds during their annual reporting period. Financial data is currently reported on the Single Audit Data Collection Form, also known as the Standard Form-Single Audit Collection (SF-SAC), which requires similar data to what is required on the Schedule of Expenditures of Federal Awards (SEFA). Both SF-SAC and SEFA are required for the Single Audit reporting process. The single audit test model sought to assess if grant recipient burden could be reduced if financial data is only required to be entered once. The single audit test was designed to

	Single Audit
	assess eliminating unnecessary duplication in financial reporting. This could lead to the reduction of compliance costs for Federal award grant recipients and minimize potential inconsistencies entering similar information through multiple collection tools.
Hypothesis	If grant recipients do not have to report the same information on duplicative forms, then grant recipients' burden will be reduced.
Test Model Approach	HHS collaborated with OFFM and the Department of Commerce Federal Audit Clearinghouse (FAC)[28] to create an environment where participants could submit key sections of the modified SF-SAC. This was conducted by having a select group of participants submit their Single Audit using the modified SF-SAC through FAC's pilot environment. The submission would fulfill the participants' SF-SAC requirement, and the FAC would automatically generate a downloadable SEFA based on the grant recipients' SF-SAC. After participants submitted their Single Audit report, they would complete a survey containing questions regarding whether this process could reduce reporting burden. This test model was conducted by: • Allowing eligible participants to submit their annual Single Audit through the FAC's pilot environment (by March 2017) (Form Completion), and obtaining their feedback; and • Describing the modified reporting process to a live audience (facilitated discussion) and obtaining their feedback on the perception of improvement based on given descriptions.

Single Audit Results and Analysis

The Single Audit test model results revealed three themes: (1) burden and time, (2) usefulness and accuracy, and (3) process improvements. Participants indicated that the proposed process could reduce time and burden associated with reporting required SEFA information. Additionally, participants noted that the SEFA template, as well as the proposed process, would reduce auditors' review time.

- **Burden and Time** – The majority of participants noted in their surveys that the proposed SEFA template and the presented changes could reduce the time associated with the Single Audit reporting process, while also reducing duplicative efforts associated with inputting the required SEFA information through the FAC portal.
  - Through testing in the FAC pilot environment, HHS found that a majority of participants believed that the use of a SEFA template containing all of the UGG required fields would significantly or somewhat reduce reporting burden.

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[28] harvester.census.gov/facweb/

- Through testing in the FAC pilot environment, HHS found that a majority of participants found that generating an exportable SEFA for the audit report would significantly or somewhat reduce time associated with the Single Audit process.

- **Usefulness and Accuracy** – The majority of participants indicated that the presented changes associated with the SEFA template could result in a reduction in audit findings related to the SEFA preparation and could assist in providing the complete and accurate information required for the Single Audit.
  - Through the use of the FAC Pilot Environment, HHS found that a majority of participants found that the upload feature of the FAC pilot system significantly or somewhat reduced errors in uploading the SEFA template to populate the SF-SAC.

- **Process Improvements** – The majority of participants in a facilitated discussion indicated that the proposed process could allow their organizations to develop better internal processes for reporting the required SEFA information. These participants also noted that the presentation clearly explained the SEFA portion of the SF-SAC.
  - Using of the FAC pilot system, HHS found that all participants believed that the upload feature of the FAC pilot system would decrease duplicative efforts in submitting their Single Audit package.
  - A majority of participants agreed that the presented proposed process could allow their organizations to develop better internal processes for reporting the required SEFA information.

- **Participant Feedback** – While most participants concluded the Single Audit test model was helpful to grant recipients and auditors, participants expressed the need for greater clarity around the SEFA template and the process to submit it as a part of their annual Single Audit.

Single Audit Conclusion

If grant recipients are able to eliminate duplicative input of SEFA information, through the proposed Single Audit process, they will have increased reporting accuracy and reduce the time it takes to submit their annual Single Audit. OFFM and the FAC will modify the current standard SF-SAC/Data Collection Form to allow for a consolidated submission that includes the SEFA, the Auditor's Summary, the entity ID, and the SF-SAC for the planned 2019 update to the ICR. OFFM will also work with Commerce, the FAC, and Federal agencies to explore opportunities to build on this elimination of duplication through auto-populating recipient data from GSA's System for Award Management by leveraging the unique entity identifier and Federal Award Identification Numbers (FAIN) for each award, as well as other potential synergies across government-wide systems for grants management.

2.5   *Notice of Award-Proof of Concept (NOA-POC)*

NOA-POC	
Referenced Legislation	DATA Act (§5(b)(1)(A) and (C))
Purpose	The Notice of Award (NOA) is the document which informs an applicant that they have received a Federal award and contains all the terms and

NOA-POC	
	conditions of that award, including necessary information for grant recipients to perform grant accounting and reporting. While the data elements included in NOAs are standardized in the Uniform Guidance at 2 CFR 200, NOAs often differ in format and content across and within Federal agencies, which becomes a burden for grant recipients who receive funds from multiple Federal sources. A standardized NOA could allow grant recipients to easily capture standardized data needed to perform routine grant reporting, as well as allowing for automated mechanisms to collect and systematically exchange grant award information. The NOA-POC test model sought to determine if having access to a standardized NOA coversheet for Federal awards, providing all information required to be later re-entered by recipients for reporting in a consistent layout, would reduce grantee reporting burden. The NOA-POC test was designed to assess whether a standard form could reduce reporting burden.
Hypothesis	If grant recipients have a standardized NOA for Federal awards, then grant reporting burden may be reduced for recipients by standardizing access to data needed to populate information collections.
Test Model Approach	HHS created a standardized NOA, several non-standardized NOAs, and a DCT for use in this Pilot Test Model. Participants were divided into two groups (Group A and Group B). Group A used the standardized NOAs to complete the DCT and Group B used non-standardized NOAs to complete the DCT. After completion of their DCT, participants were asked to self-report their completion time. HHS compared the completed DCT from both groups for accuracy of captured data and time to complete. After submitting their DCT, participants completed a survey where they were asked to assess if the standardized NOA reduced their reporting burden and asked for their input on what elements they would like to see in a standardized NOA.

NOA-POC Results and Analysis

In evaluating the results for NOA-POC three themes emerged from the results: (1) burden and time, (2) usefulness and accuracy, and (3) allowance for automation. Participants reacted positively to the prospect of a standardized format for the NOA. Participants found the idea of a standardized NOA would reduce their reporting burden, with a majority noting that they believe it could significantly increase the ease in which they collect and report information on multiple awards.

- **Burden and Time** – The majority of participants noted in their surveys that the standardization of the NOA would decrease burden associated with Federal award reporting throughout the fiscal year. Additionally, the amount of time to complete the experimental DCT for participants with standardized NOAs was shorter than for those with non-standardized NOAs.
- **Usefulness and Accuracy** – The majority of participants indicated that standardization of the NOA would increase the accuracy with which data is captured from NOAs. Additionally, the

mean and median score of the DCT for participants with standardized NOAs was higher than for those with non-standardized NOAs.
  - o A majority of participants believed that the standardization of the NOA would make the accuracy with which data is captured from NOAs significantly more accurate, while:
  - o On average, participants using standardized NOAs scored higher on the DCT than those using non-standardized NOAs.
- **Allowance for Automation** – The majority of participants indicated that it was very likely the standardization of the NOA would allow their organizations to engage in more advanced or automated mechanisms for collecting grant award information.
- **Participant Feedback** – While most participants concluded that a standardized NOA would decrease reporting burden, they also provided suggestions for consideration in the creation of a standardized NOA. Many recommendations surrounded the topic of standardization of NOA form layout and consistent use of data terms. While the official standard list of data elements required to be included in all Federal NOA is codified in 2 CFR 200.210, participants also recommended specific data terms, such as principal investigator, that are not currently required data elements.

NOA-POC Conclusion

If grant recipients are supplied with standardized NOAs, then they will have the ability to more easily and accurately complete grant information collections. The data elements required to be included in a NOA were codified by OFFM in the Uniform Guidance at 2 CFR 200.210. OFFM will work with Federal agencies to continue to explore opportunities to further relieve burden by generating NOAs in a standard format based on prepopulated data from government-wide web-based systems, such as GSA's System for Award Management, HHS's Grants.gov, and others, as appropriate. Further, OFFM and Federal agencies will explore additional opportunities to reuse this data rather than requiring recipients to report information the Federal government already possesses.

2.6   Learn Grants

Learn Grants	
Referenced Legislation	DATA Act (§5(b)(1)(C))
Purpose	Grants.gov is an online find-and-apply portal serving as a single access point for the 26 Federal grant-making agencies. Grants.gov houses information on over 1,000 domestic and international grant programs. In May 2015, Grants.gov launched the learn grants tab within Grants.gov. The learn grants tab seeks to address grant recipients' need for a single information source regarding Federal requirements throughout the grants lifecycle. The learn grants tab compiles relevant information pertaining to the entire grants lifecycle in an easy to navigate webpage. By utilizing this resource, it is possible that grant recipients will spend less time researching

Learn Grants	
	Federal grants' requirements and processes that could lower compliance costs. The purpose of the learn grants pilot test model is to assess whether grant recipient burden is reduced if they are supplied with grants lifecycle information in one website.
Hypothesis	If grant recipients are supplied with grants lifecycle information in one website, then they will have increased access to grants resources and knowledge of the grants lifecycle process.
Test Model Approach	HHS created a knowledge quiz using information existing in the learn grants tab to be taken by Pilot participants. During this pilot test model, participants were asked to complete the first knowledge quiz using existing knowledge and without access to learn grants. HHS then provided an overview of the content in the learn grants tab. Finally, participants were asked to complete the same knowledge quiz with access to learn grants. HHS compiled the results from both knowledge quizzes and compared the results. After participants submitted their second quiz, they completed a survey intended to assess whether access to grants lifecycle information in the Learn Grants tab was useful in providing accurate responses, and if the use of the tab helped to increase their knowledge of the grants lifecycle.

Learn Grants Results and Analysis

In evaluating the results for the Learn Grants test model, three themes emerged from the results: (1) burden and time, (2) usefulness and accuracy, and (3) grants knowledge. Participants found the Learn Grants tab on Grants.gov to be useful, with a majority noting that they believe the tool could reduce reporting burden and time needed to comply with grant requirements, and increase usefulness, accessibility, applicability of the Grants.gov website, and increase grants lifecycle knowledge as a whole.

- **Burden and Time** – The majority of participants noted that learn grants would positively impact their compliance with grant reporting requirements by helping to reduce the amount of time it takes to report . Additionally, the majority of participants believe learn grants could reduce their burden regarding grants-related inquiries .
- **Usefulness and Accuracy** – The majority of participants indicated that Learn Grants is useful in extracting relevant information and providing users with knowledge on the grants lifecycle and processes . They noted that the information found in Learn Grants would be beneficial to their organization .
- **Grants Knowledge** – The majority of participants improved their knowledge quiz scores after using Learn Grants, indicating Learn Grants can help to increase grants knowledge.
- **Participant Feedback** – Most participants believe that learn grants is a great tool for those who have little to no knowledge of the Federal grants process, while also providing feedback on how to improve the Learn Grants tab. One participant stated:

"For those new to grants, this website is a great resource. It is a great tool for folks that have been thrown in with little to no knowledge and provides the ability to obtain information on your own to get up to speed quality to ensure [you're] following the correct processes."

Participants also provided suggestions for improving the learn grants tab on Grants.gov. For example, they recommended improvements to the aesthetics of the website and the potential increase of usability with a "Search" feature specifically for learn grants, Section 508 compliance in graphs and flow charts, and larger font. Other recommendations included adding a glossary of terms and acronyms to ease recipient burden and eliminate repetitive areas of the site.

Learn Grants Conclusion

If grant recipients are supplied with grants lifecycle information in one website, then they will have increased access to grants resources and knowledge of the grants lifecycle process. The Learn Grants tab is available on the Grants.gov home page. OFFM encourages Federal agencies to use Learn Grants as an additional resource for the grants community, including grantees. OFFM will work with HHS and subject matter experts across the grants community to continue to develop the resources available here.

SECTION III: LESSONS LEARNED AND ADDITIONAL OPPORTUNITIES

HHS identified key lessons learned throughout the pilot phases. The purpose of this section is to document those lessons learned and additional opportunities for improvement.

Direct Engagement with Stakeholders

Stakeholder relationships and engagement were critical to the success of the Pilot. As such, future similar efforts should leverage stakeholder relationships whenever possible. These stakeholders supported Pilot design and execution that confirmed the test hypotheses aligned with their interests.

HHS obtained input from stakeholders[29] on every phase of the pilot. HHS presented (via Town Hall meetings, pre-test meetings, and over 70 other events) the design of each test model to stakeholders prior to finalizing the test model. Additionally, HHS maintained close relationships with various stakeholders throughout the execution phase, and received valuable participation and input by conducting test models at multiple partner organization training events. HHS's partnerships with system owners were especially valuable in designing and executing the Test Models involving systems, such as the CDER Library, PMS, FAC, and Grants.gov. After HHS drafted recommendations, these proposed recommendations were presented to the SMEs, the COFAR, and the FACE to obtain broader Federal grants community feedback.

By directly engaging stakeholders, HHS was able to design and execute a Pilot framework, which addressed the grants community issues or concerns.

Strong Collaboration with OMB

The pilot succeeded with regular confirmation of established expectations and communications with OFFM. Specifically, HHS collaborated weekly with OFFM to plan and manage work products, schedule Pilot testing, and minimize Pilot risk.

Throughout all phases of the Pilot, OFFM and HHS maintained regular and open communications. HHS informed OFFM of stakeholder input. Additionally, HHS partnered with OFFM for test model design (including seven PRA approvals), and execution strategies and actions. HHS and OFFM worked closely throughout the drafting of the report.

This type of collaboration and partnership assisted HHS and OFFM in maintaining agreed-upon expectations, and developing creative, innovative, and practical strategies for pilot design, execution, and reporting.

Versatile Communications Strategy with Grants Community

HHS reached out to over 10,000 individuals through various platforms during the execution of the pilot. HHS recognized that a versatile communications strategy was important for obtaining the feedback from a diverse grant recipient community. The various communications platforms (website, twitter, newsletters) used allowed HHS to inform stakeholders of its ongoing pilot activity, extend its reach and influence, and foster valuable connections.

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[29] See Section 1.3.1 for a complete list of stakeholders.

Targeted communication channels and planned timing of delivering communications are fundamental for successful stakeholder engagement. To facilitate Pilot execution, HHS followed a detailed communications plan including email outreach (via GovDelivery), telephone calls, website announcements, newsletters, and Twitter messages. HHS continuously engaged with those interested in participating in the pilot. HHS performed targeted outreach by making phone calls to over 700 grant recipients, which increased participation. These efforts resulted in HHS's successful recruitment of 501 diverse participants from the grants community in the pilot.

Accessible Data Collection Tools and Processes Used in the Grants Community

To further promote participation, HHS conducted 10 in-person and 12 remote testing sessions. For participants' convenience, HHS provided participants with web-enabled tools (tablets, SurveyMonkey, etc.) that were instrumental in overall participation. These efforts allowed participants to fully partake in Pilot testing and resulted in 501 participants, and assisted HHS in collecting, compiling, and analyzing data.

Additional Opportunities

In addition to documenting lessons learned derived from the Pilot, HHS and OMB identified key opportunities for additional study that could be performed related to the pilot.

General Education Provisions Act (GEPA)

The General Education Provisions Act (GEPA), passed in 1994, contains statutory provisions that apply to the majority of Federal education programs administered by the U.S. Department of Education (ED). The provisions span a wide range of topics, including appropriations and evaluations, and privacy and enforcement. Under Section 424 of GEPA, State Education Agencies (SEAs) are required to report on the usage of Federal funds, as well as provide a list of expenditures of Federal funds by Federal program area and report all grants and contracts provided to sub recipients including local education agencies. SEAs submit this data in the EDFacts system (a system established by ED to dramatically streamline reporting for SEAs). SEAs are also required to report subaward data to the FFATA Subaward Reporting System (FSRS) that transmitted for display on USASpending.gov. Therefore, it is possible that duplicate data is being reported by SEAs to EDFacts and the FFATA reporting requirements systems.

The DATA Act aims to establish government-wide data standards, simplify Federal financial reporting, and improve data quality. Section 5 of the DATA Act requires OMB to conduct a pilot to assess standardize reporting, the elimination of unnecessary duplication in financial reporting, and reduction in compliance costs for recipients of Federal awards. Section 424 of GEPA is an area where duplication in financial reporting may be eliminated to help reduce burden on grant recipients.

HHS suggests further study and analysis of potentially duplicative reporting requirements as demonstrated with GEPA, and DATA Act reporting. In addition, HHS recommends that when considering the issuance of future legislation on reporting requirements, further study be conducted regarding the possible overlap of any new reporting requirements with existing reporting requirements, whether for the recipient or the Federal agencies, in an effort to minimize and streamline those activities.

Explore Comprehensive Taxonomy of Standard Definitions and Improve Recipient User-Interfaces

The results under this pilot demonstrate that there are additional opportunities to significantly reduce burden on recipients of Federal financial assistance awards by integrating and consolidating the number of systems and data elements with which a typical recipient must interact to submit required information to the government to manage Federal awards. These results build on years of frustration expressed generally by the Federal agency and recipient community over the lack of data standardization and burden associated with reporting information to Federal awarding agencies. This burden is especially apparent to recipients of multiple Federal awards who report that they are often providing the same or very similar information to multiple Federal agencies or components within the same agency and that this data is provided through several different interfaces.

Similarly, Federal awarding agencies report that there is no government-wide solution allowing agencies to share award level information (including performance) and that there is no standard business process that could be leveraged to support this effort. Agencies report that they are limited in standardization efforts due to conflicting statutory and/or regulatory requirements associated with financial assistance awards.

V   JOINT RECOMMENDATIONS AND NEXT STEPS

As described in the executive summary, OMB plans to take actions on the following recommendations based on the findings from the pilot. This portion of the report provides further context regarding these recommendations.

Recommendation #1: Continue to standardize data elements, conditions, and attributes to meet the statutory, regulatory and business needs of the various communities.

Building on DATA Act progress to-date, OMB and Federal partners will continue to standardize relevant data elements across Federal lines of businesses, streamline information collections across government, and leverage technology to eliminate duplicative reporting. The results from the procurement and grants test models demonstrated that standard data elements coupled with uniform agency adoption and the ability to centrally collect and share information reduces administrative burden. These results provide opportunities for developing a comprehensive taxonomy of standard definitions for core data elements required for managing Federal financial assistance awards. This taxonomy could be made public in a machine-readable format, which could form the basis of shared software as a service for both Federal and state, local, tribal, university, and nonprofit parties. Further, data elements that are standardized lend themselves most easily to pre-population per recommendation #2 below, building even further efficiencies into reporting. Finally, standardizing data elements allows those elements to be aggregated and compared when reported publicly, thereby improving financial transparency.

Recommendation #2: Eliminate unnecessary duplication in reporting by leveraging opportunities to use information technology that can easily auto-populate from relevant existing Federal data sources.

The procurement test model and, for grants, the CDER-Library-2 test model, Notice of Award test model, Consolidated Federal Financial Report (CFFR) test model, and Single Audit Test model, all demonstrated that recipient burden is reduced when identical data can be entered once in one place and reused rather than entered multiple times in multiple places. Recipients currently enter data into IAE that they must then re-enter into Grants.gov, some of which re-appears on Notices of Awards, and must be re-entered again into FFRs reported in multiple places, and again in performance reports and audit reports. The results from these test models provide opportunities to streamline/centralize existing systems and/or develop an integrated user-interface for the many government wide support systems applicants and recipients must use to manage their Federal awards so that standardized data elements can be entered once and repopulated as necessary automatically in web-based forms. OMB together with agencies can explore ways to connect these systems so that recipients can enter their data once, and find the data are available to them in pre-populated form the next time they are required to add updated information. Based on pilot results, such simplification would increase both accuracy and ease of reporting.

Recommendation #3: Leverage information technology open standards to rapidly develop any new tools needed.

The data and information collected to date from the three phases of the procurement pilot, including stakeholder outreach, support moving forward with scaling the proof-of-concept reporting tool to accept more FAR required reports from more contractors. OMB is working with GSA to include the capability for reporting under (insert FAR clause here) beginning in FY 2018.

OMB can further conduct a refreshed inventory of FAR (and FAR supplement) required reports and reporting systems and an action plan for streamlining all reporting and access developed to have the IAE be the single entry, collection, and access point contractor reporting.

OMB is exploring opportunities to develop and test a similar central reporting portal for grants, building off the work done for the procurement pilot and leveraging shared services. As Grants.gov moves to a web-based service, OMB will intensify its efforts with HHS, IAE, Federal Audit Clearinghouse, and Federal agencies to explore opportunities to build on this elimination of duplication through auto-populating award and recipient data, as well as examine other potential synergies across government-wide and agency-owned systems for grants management. OMB is considering how to best leverage existing services, whether they are shared services, or web services and reuse these capabilities, rather than rebuild them multiple times. Using existing authentication services across the Federal government for web-based systems, for example, similar to how commercial login and authentication services are prevalently used, would result in cost savings and burden reduction.

APPENDIX A: ACRONYMS

ACT-IAC	American Council for Technology - Industry Advisory Council
AGA	Association of Government Accountants
AICPA	American Institute of Certified Public Accountants
ASFR	The U.S. Department of Health and Human Services, Assistant Secretary for Financial Resources
CAOC	Chief Acquisition Officers Council
CDER	Common Data Element Repository
CFDA	Catalogue of Federal Domestic Assistance
CFFR	Consolidated Federal Financial Report
DATA Act	Digital Accountability and Transparency Act of 2014
DAP	DATA Act Program Management Office
DCT	Data Collection Tool
DTC	Data Transparency Coalition
DUNS	Data Universal Numbering System
FAC	Federal Audit Clearinghouse
FAIN	Federal Award Identification Number
FAR	Federal Acquisition Regulation
FDP	Federal Demonstration Partnership
FFR	Federal Financial Report
GSA	General Service Administration
GPA	Grant Professionals Association
GRIP	Grant Reporting Information Project
HHS	Department of Health and Human Services
IAE	Integrated Award Environment
NCURA	National Council of University Research Administrators
NGMA	National Grants Management Association
NOA-POC	Notice of Award-Proof of Concept
OFFM	Office of Federal Financial Management
OFPP	Office of Federal Procurement Policy
OMB	Office of Management and Budget
POC	Point of Contact
PPF	Pilot Participation Form
PRA	Paperwork Reduction Act
SEFA	Schedule of Expenditures of Federal Awards
SF-SAC	Standard Form-Single Audit Collection/ Data Collection Form
SME	Subject Matter Expert
UGG	Uniform Grants Guidance

APPENDIX B: PROCUREMENT PILOT OUTREACH INFORMATION

The table below summaries the ideas identified during contractor engagement for post-award reporting burdens and shows that the Section 5 procurement pilot test models are aligned with the contractor concerns.

Central Reporting Portal – Proof of Concept	
Post-award Reporting Burdens as Identified by Contractor Feedback (2014 Open Dialogue reiterated in 2015 National Dialogue)	**Section 5 Procurement Pilot Capabilities Addressing Contractor Burden Feedback** (with 40% of FAR reporting requirements being reported in a decentralized manner, pilot test models but address contractor burden and government efficiencies by maximizing IT capabilities)
- Requirement to repeatedly report same thing to each agency instead of submitting once to a centralized location. - Why does the government still require paper submissions? - Cost of compliance reports as contractors have to develop and maintain tracking and reporting systems. - Extensive data collection requirements in FAR combined with agency-specific reporting is increasing costs and risks. - Contractors should not have to submit numerous copies of forms, government should go electronic, paperless, and electronic signatures so duplicate copies are not required. - Needs to be a clearing house for sharing information across agencies to avoid unique registrations, passwords, data submissions. - There should be more pre-populated forms and drop-down options for minimizing reporting. - There is a need to minimize weekly re-entry of same information that was previously submitted.	- Contractors are required to repeatedly report payroll to each agency instead of one centralized location. - Contractors are required to maintain systems (or hire them out). - Requires submission of numerous copies to multiple locations (and sometimes same location) - Cannot be shared across agencies in current form. - Does not allow for any pre-population or drop-down for submission. - Requires re-submission of same or similar information as submitted in previous week.

APPENDIX C: PROCUREMENT PILOT DATA ACT IMPLEMENTATION ACTIVITIES

Execution of the Section 5 procurement pilot has been arranged into a series of phases – each designed to inform subsequent phases within the interconnected pilot activities and broader burden reduction efforts. The Federal government is the target audience for some phases with contractor engagement and participation in later phases. Data collection involves focus groups, participant feedback, user experience, and analytics. The Section 5 procurement pilot schedule was designed within existing and available resources (dollars and staff) in OFPP, the CAOC, GSA IAE, GSA 18F, GSA Federal Acquisition Service (FAS), and federal agencies. The three phases and major activities associated with each phase include:

Phase One (Plan and Design Phase): February 2015 – February 2017

- OMB plans and launches the National Dialogue to obtain feedback on reducing recipient reporting burdens and compliance costs.

- OMB, CAOC, and GSA 18F and FAS plan, design, build, and launch a proof of concept reporting tool to pilot central collection of contractor reporting required under the FAR.

   - OFPP defines objectives for the procurement track – modernize how, when, and to whom contractors are reporting key information in an effort to reduce burden while increasing the availability of information to be used in federal business decisions. Businesses of all sizes are required to report certain information to the Federal government. This information may be the result of legislation or regulations from Occupational Safety and Health Administration (OSHA), DOL, Equal Employment Opportunity Commission (EEOC), Securities and Exchange Commission (SEC), Treasury, National Labor Relations Board (NLRB), and other agencies. In addition to these reporting requirements, businesses contracting with the Federal government must also report information in accordance with the FAR, agency supplements to the FAR, and other terms and conditions deemed appropriate by agencies.

   - These reports are sometimes reported once and used many times; in other cases, these reports are reported multiple times to multiple sources, in multiple agencies and are not available for re-use. As businesses have modernized to increase productivity and customer service, they may still be required to report information to the Federal government via fax, emailed file, email, or telephone. As the Federal government looks to deliver IT in a smarter fashion and with open data, the Federal government must be smarter and more aggressive in how it collects and uses required information.

   - Decentralized reporting decreases transparency and increases burden on both the contractor and the contracting officer. The increased burden can result in increased costs to the taxpayer as well as a reduction in the amount of time contracting officials have to focus on higher impact and higher priority areas. Lack of a central repository for information reduces the likelihood that source selection officials, project managers, contracting officers, and contracting officer representatives will use this information in making contracting decisions, reporting past performance, or managing business arrangements.

Phase Two (Data Collection and Analysis Phase): February 2017 – February 2018

- Conduct data collection and analysis for a twelve-month reporting period of the Section 5 procurement pilot areas and determine compliance costs.

    o Collect FAR 22.406-6 (Payrolls and Statements) weekly reports from select contractors

    o Collect responses to following questions:

    For this report, approximately how much time did it take to prepare and submit? (drop down at 15 minute increments)

    For reports submitted outside of this pilot, approximately how much time does it take to prepare and submit the report? (drop down at 15 minute increments)

    Are there any other changes in the federal award environment that are reducing your reporting burden?

- Refine questions in the National Dialogue tool to further understand reporting burden and compliance costs.

- Using ongoing feedback from pilot participants, modify pilot reporting tool as necessary

- Analyze feedback on pilot collection, technical aspects of tool in IAE, and depending on feedback, expand to all Davis Bacon reporting, other FAR reporting requirements such as hydrofluorocarbons (HFCs), service contract, bio-preferred, and affirm action plans.

Phase Three (Reporting Phase): March 2017 – August 2017 (with any updates being provided by March 2018 if continued data collection identifies any changes)

- Conclude existing data collection under the pilot and analyze results for required updated report.

- Continue data collection under additional areas to further test proof of concept for scaling reporting tool into IAE capabilities.

- Ongoing analysis of results gathered through the pilot on each test model to inform changes in standards, processes, or technology necessary to scale the capability to meet all FAR contractor reporting requirements.

APPENDIX D: PROCUREMENT PILOT SAMPLING PLAN

The DATA Act requires that the government satisfy the following statutory requirements for participation in the Section 5 procurement pilot:

1. (A) include a combination of Federal contracts, grants, and subawards, the aggregate value of which is not less than $1,000,000,000 and not more than $2,000,000,000;
2. (B) include a diverse group of recipients of Federal awards; and
3. (C) to the extent practicable, include recipients who receive Federal awards from multiple programs across multiple agencies.

The following activities were conducted in order to include a diverse group of recipients in the test model for piloting a central reporting collection tool::

1. Choose a minimum sample of participants required for testing the collection tool.
2. Identify the pool of eligible participants for the pilot, namely federal contractors with the Davis Bacon requirement.
3. Outreach to federal agencies and contractors to identify pilot participants.
4. Modify contracts as necessary.
5. Revise and/or repeat steps 3 through 4 as necessary to achieve a minimum sample population to meet statutory requirements and test feasibility of centralized FAR reporting.

In creating the sampling method for pilot participants, OFPP reviewed GAO-12-208G, *Designing Evaluations* of January 2012. The sampling method is intended to address the requirements for a diverse group of federal contractors that work with various federal agencies and are all required to meet a representative reporting requirement, FAR 22.406-6 (Payrolls and Statements) reporting. The sample of the first phase testing is limited to those with the Davis-Bacon requirement as this reporting requirement represents 100% of the applicable pain points identified by participants in the 2014 open dialogue. The sampling method supports participation of the procurement portion of the aggregate dollar value of the pilot and uses verified data from the Federal Procurement Data System (FPDS) to determine the pilot participant population. The sampling plan represents input and recommendations from the GSA 18F and IAE teams.

Test Model Participation Requirements

In order to plan for and execute a pilot that would meet both the statutory requirements of the DATA Act and identify opportunities/gaps for scaling the solution for all federal contractor reporting, OFPP first reviewed existing GAO documentation on best practices for designing evaluations. The intent was to identify and build in lessons learned that could apply to the DATA Act pilot as well as be a method for assessing progress. The primary document used for the original design was the January 2012 GAO reporting on designing evaluations.

OFPP recognizes that sample size manageability and project scope are primary concerns when designing a pilot. A manageable sample size is needed to plan for and build the pilot reporting tool, adjust the tool

in an agile manner, analyze data, and then expand scope. The test model must consider resources available within existing offices and organizations to both manage the pilot and ongoing efforts for both information technology development and contracting officer reports. The pilot must include the capability to be able to interact with pilot participants in a timely manner to support continued engagement and ensure a robust participant experience.

The design of the procurement pilot and test models is based on GAO recommended practices and incorporates feedback obtained during seven interview sessions with GAO between January 2015 and August 2016. The statistical sampling design described in this appendix was used to identify a recommended range of contractors that should be targeted for participation. The results indicate pilot participation should be a minimum of 180 contractors and the outreach strategy is designed for that target. Based on feedback from the 18F team during discovery and prototype development, initial launch should be limited to a smaller size to support more robust participation and assessment of the tool and the participant size can be increased over time. For these reasons, the target population for launch is 10% of the overall population with exponential increases as the agile development incorporates feedback. This approach will support agile development, allow for prompt response to contractor feedback or inquiries, and support testing the scaling of the pilot solution. The burden analysis for the data collection is based on a participation rate of 20% of the eligible pool.

Sampling Design

The Federal Procurement Data System is the data source for determining the universe of construction contractors for testing the proof-of-concept reporting tool. In July 2015, the GSA IAE pulled data from FPDS to identify the universe of contractors with the following information:

(1) The requirement to report under Davis Bacon,
(2) A contract with base and options performance period that encompassed the timeframe necessary to participate in both the development and collection aspects of the pilot,
(3) Information necessary to uniquely identify each contractor, and
(4) Information necessary to identify the small business status of the contractor.

The results identified approximately 3600 contractors meeting the basic criteria with obligations of approximately $693M. As participation will require changes to contract terms and conditions, the sample is non-random.

Determination of Sample Size Needed for Outreach

The determination of the total sample size is based on a number of factors. Assumptions and calculations are below and the baseline for figures is the assessment of potential contractors:

- Of the contractors with Davis-Bacon reporting requirements, 5-20% participation would be the target based on GAO and other statistical recommendations.

- An iterative approach to the pilot development and implementation necessitates starting with a smaller number of participants and expanding as the minimally viable product in future releases.

A starting point of 10% with regular increases would support robust contractor engagement for the reporting tool.

- Assuming 5%-20% participation, this approach necessitates outreach to 720 contractors.

The table below summarizes the assumptions determining the sample size requirements.

	Parameter	Assumption
1	Minimum Test Model Participation	180
2	Number of Test Models	1
3	Response Rate from outreach	50%
4	Participation Rate from those responding	50%
5	**Minimum Number for Outreach**	**720**

Allocation of Sample Size across Business Size and Federal Agencies

The DATA Act requires participants in the pilot to cover a broad range of agencies as well as include a mix of size status. To identify the optimal target mix of contractors for the pilot reporting tool, the following criteria are applied for initial outreach:

1. contractor holds contracts with more than one federal agency;
2. contractor holds contracts with more than one component of a federal agency;
3. contractor size status (small or other than small);

The sample population for the pilot data reporting will continue to be monitored with additional outreach conducted to cover these criteria as well as address the dollar value needed to proportionately represent the procurement value of the overall $1B – $2B. Additional volunteer participants will be welcomed.

In addition to the characteristics of those participating in the data reporting portion of the pilot, the demographics of the participants in the National Dialogue will also be monitored to gather information on those contributing ideas as well as data.

Contractor Inclusion in the Pilot Data Collection

Contractor participation required changes in terms and conditions for each contract for which reporting will be shifted from the current method to the pilot method. This is essential to avoid duplicate data reporting for pilot participants. OMB reached out to agencies for which there is a population of contractors that have expressed interest (via outreach) in participation as well as to agencies with contractors in the target data pull. The agencies coordinated essential communication with the contractors to support reporting of data to the central reporting portal. The design of the pilot was intended to result in the same contractor reporting data in multiple ways (under the pilot and in the existing manner) depending on which contracts are changed. The intent was to create an informal control group that will further assist in data analysis. During the remainder of the 12 month reporting period for the pilot, OMB will monitor participation and update lessons learned based on data

submission and contractor feedback. As of the date of this report, there are 10 registered users of the tool, nine Federal contracting officers and one Federal contractor. Several potential contractor users have expressed interest in using the central reporting tool; however, they have requested that the tool have the capability of communicating with third party systems that process payroll reporting. User feedback is being recorded for future sprints in the agile development of the central reporting tool.

APPENDIX E: GRANTS PILOT TABLE OF FIGURES

TABLE OF FIGURES

APPENDIX F: GRANTS PILOT COST ESTIMATE

The total cost of the grants pilot, including the activities covered by the plan & design, data collection & analysis, and report phases of the project plan was over $5.5 million across fiscal years 2015 – 2017. This total pilot cost includes the costs to collect data from participants, as required by Section 5 of the DATA Act. Specifically, this cost includes Federal employee compensation, pilot contractual support, relevant pilot related overhead costs, pilot-related travel expenses, and specific test model execution costs (i.e., Federal Audit Clearinghouse, HHS Payment Management System, Grants.gov, etc. costs). Additionally, this cost estimate includes costs associated with events attended on behalf of the pilot including events to discuss the pilot program and solicit feedback and the cost of hosting in-person test models.

APPENDIX G: GRANTS PILOT SAMPLING PLAN AND EXECUTION

Under Phase Two: Data Collection and Analysis, HHS performed the following steps:
- Finalized the approach and objectives of the six grants pilot test models (final test model summaries are provided in Section II);
- Designed a pilot participant sampling plan, including:
  o Identification of minimum sample size,
  o Identification of diverse population,
  o Recruitment of diverse population-pilot participation form, and
  o Assignment of diverse population into pilot test models;
- Complied with PRA requirements for each test model;
- Executed test models including:
  o Assessed invitations from groups interested in hosting test models at events,
  o Determined appropriate avenues to conduct remote testing such as webinars,
  o Performed pilot test models to obtain input in accordance with testing plan, and
  o Compiled survey totals; and
- Compiled and analyzed pilot test model results.

Sampling Plan

In order to fulfill legislative requirements, HHS ensured that prior to test model execution; a diverse population and adequate sample size were determined to ensure the most accurate results for data collection and analysis. HHS created a sampling plan to determine minimum sample sizes required for each test model. This sampling plan and fulfillment of legislative requirements is described in greater detail throughout this section.

Legislative Requirements

The DATA Act requires that the Federal government satisfy the following statutory requirements for participation in the pilot:
- "(A) include a combination of Federal contracts, grants, and subawards, the aggregate value of which is not less than $1,000,000,000 and not more than $2,000,000,000;
- (B) include a diverse group of grant recipients of Federal awards; and
- (C) to the extent practicable, include grant recipients who receive Federal awards from multiple programs across multiple agencies."

Pilot Participant Sampling Plan

HHS's approach for the pilot framework contains six different test models, five[30] of which require grant recipient participation (participants). The pilot participant sampling plan outlines the following:
- Minimum sample size of participants per pilot test model;
- Identification of diverse population;
- Recruitment of diverse population–pilot participation form (PPF); and

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[30] Consolidated Federal Financial Reporting, Learn Grants, CDER Library 1, Single Audit, and Notice of Award. CDER Library 2 does not require grant recipient participation. Means of participation will vary by Test Model but includes virtual participation and In-Person events.

- Assignment of diverse population to pilot test models.

Minimum Sample Size

To successfully execute the pilot, a minimum sample size was identified for each test model. It is important to note that pilot test model participation was not limited to the determined minimum, but rather the minimum was used as a baseline for pilot test model samples. HHS recognized the need to maintain a manageable sample size to maintain high engagement levels with participants.

Sample size determination was used as a starting point for establishing a reasonable and manageable sample for execution of the pilot test models. When determining an appropriate target minimum sample size, HHS was limited by several restraints including the resources required to provide 'help desk services' to all pilot test model participants in a timely manner and the finite duration of pilot test model activities, which must conclude in 2017.

Although the DATA Act legislation does not require statistical validity and the pilot test model results are not presented as being conducted under statistically valid parameters, HHS estimated the minimum sample size necessary for attribute testing[31] based on the total population of Federal award recipients contained in USASpending.gov[32] for fiscal year 2015. HHS targeted a one-sided confidence level of 90% and a sampling precision of 10% as well as an attribute testing satisfaction rate of 80%. Based on the population of 40,070 Federal award recipients included in USASpending.gov for fiscal year 2015 a minimum sample size of 42 participants for each pilot test model was necessary to meet these parameters. It is important to note that the pilot test models were not limited to this method of attribute testing and results are not presented as being conducted under statistically valid parameters, this exercise was conducted solely for the purpose of determining a target minimum sample size for each pilot test model.

After determining a minimum sample size for each pilot test models there were several assumptions made for determining a total sample size of grant recipients needed for outreach in the pilot test models.

Assumptions:
- Response rate for contacted award grant recipients: 50 percent,
- Participation rate for award grant recipients responding to the PPF: 60 percent, and
- Outreach to a minimum of 700 grant recipients.

The table below summarizes the assumptions made to meet the sample size requirements.

Figure 7: Sample Size Assumptions

Sample Size Assumptions		
	Parameter	**Assumption**
1	Minimum Number of Participants per Test Model	42

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[31] Attribute testing could allow HHS to estimate a compliance rate for the pilot test models, or, more specifically, to estimate the percentage of participants satisfied with a pilot test model. It is important to note that the pilot test model results are not presented as being conducted under statistically valid parameters, this exercise was conducted solely for the purpose of determining a target minimum sample size for each pilot test model.

[32] www.usaspending.gov/Pages/Default.aspx

Sample Size Assumptions		
	Parameter	**Assumption**
2	Number of Test Models	5
3	Response Rate	50%
4	Participation Rate	60%
5	**Minimum Number of Grant Recipients Needed for Outreach**	**700**[33]

From the sampling design described above, HHS determined that a minimum sample size of 42 participants for each of the five pilot test models that required grantee participation (42x5=210 participants in total) was both reasonable and manageable for the execution of the pilot. These minimum sample sizes allowed HHS to respond promptly to individual participant inquiries or concerns, and allow for inclusion of a diverse group of Federal award recipients as required by the DATA Act.

Identification of Diverse Population

To include a diverse group of grant recipients in the pilot test models, HHS followed the following steps:
1. Choose a minimum sample of participants required for each pilot test model.
2. Identify a potential sample of grant recipients to solicit participation for the pilot test models that approximates the diversity of Federal grant recipients.
3. Revise step 2 as necessary to achieve a minimum sample population that meets the statutory requirements.

Several data sources were leveraged to assist HHS in viewing the general population of Federal grant recipients. The most important of these sources is USAspending.gov.[34] All Federal grant records for fiscal year 2015 were downloaded for analysis. Each record contained information about the (1) grant recipient, including name, Data Universal Numbering System (DUNS), and physical location; (2) awarding agency; (3) grant program as described by the Catalogue of Federal Domestic Assistance (CFDA) number; and (4) dollar value award.[35] [36]

After evaluating the USAspending.gov fiscal year 2015 population data, HHS used a statistical analysis software application that is widely accepted for sampling analytics to select the sample size of 700. As described by the sampling design above, this sample size was selected based on assumptions of response rate and participation rate as well as a desire for a manageable sample size that would allow HHS to respond to individual inquiries or concerns. This approach was reviewed by multiple Federal officials with experience in the development of sampling methodologies and familiarity with the goals of the pilot.

The minimum overall sample size of 700 was proportionally allocated across the grant recipient types based on the number of grant recipients classified into each category in the USAspending.gov population. The results of this allocation are shown in the table below.

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[33] Minimum outreach needed to meet parameters for Test Model participation including response and participation rate.
[34] www.usaspending.gov/Pages/Default.aspx
[35] HHS was not able to account for organizations reporting under multiple DUNS numbers, but estimates that this did not have a meaningful impact on the Pilot.
[36] HHS did not include the Federal agency grant recipient category in the data download. Federal agencies do not receive Federal grant awards. The entries are all zeroes in USAspending.gov.

Figure 8: Sample Size Allocation

Group	Grant Recipient Type	N (Total USAspending.gov Fiscal Year 2015)	Sample Size
1	00: State government	2,408	42
2	01: County government	1,917	33
3	02: City or township government	6,502	113
4	04: Special district government	990	17
5	05: Independent school district	5,383	94
6	06: State controlled institution of higher education	1,129	19
7	11: Indian tribe	911	15
8	12: Other nonprofit	12,336	215
9	20: Private higher education	697	12
10	21: Individual	7	7
11	22: Profit organization	1,219	21
12	23: Small business	2,532	44
13	25: All other[37]	4,039	70
Total		40,070	702

Recruitment of Diverse Population – Pilot Participation Form (PPF)

HHS reached out to the initial 702 grant recipients with information on the pilot and test models through the PPF (Appendix I: Grants Pilot Participation Form). An e-mail was sent via GovDelivery to all 702 grant recipients with an overview of the pilot and a mechanism for indicating if the grant recipient was interested in participating.[38] Interested participants were asked to read brief descriptions of each of the pilot test models and indicate which test models they would like to participate in. HHS refers to grant recipients who showed interest in participating in the pilot as "respondents." HHS tracked the number of respondents to this initial 702 grant recipients who received the first PPF (PPF1) and determined that the minimum sample size was not fully met. To meet the minimum sample size, HHS repeated the process from April 2016 through June 2016, discussed above. HHS developed a new unique list of 3,027 grant recipients who were invited to participate via an e-mail distribution of the second PPF (PPF2). The combined results from PPF1 and PPF2 did not result in meeting the minimum sample size per pilot test model. Therefore, HHS repeated the process a third time and developed another unique list

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[37] 'All Other' label is defined by USAspending.gov as including those grant recipients not otherwise categorized by other 'grant recipient_type' labels.

[38] HHS used the System of Award Management (SAM) to locate the government point of contact associated with the DUNS number for each recipient. There was a possibility that the government point of contact in the SAM did not deal with grants or the grants process. Considering this, HHS also gathered additional data from the GrantSolutions database and the Electronic Research Administration Commons (eRA Commons) database to locate additional points of contact that may be more familiar with the grants process. In cases when the aforementioned sources did not contain associated contact information, HHS search for contact information manually using publicly available information.

of 3,795 grant recipients who were invited to participate via an e-mail distribution of the third PPF (PPF3). At this point the cumulative number of responses met the minimum sample size per pilot test model. The chart below outlines the three PPF email recruitment efforts:

Figure 9: Pilot Participation Form (PPF) Outreach Summary

Pilot Participation Form Outreach Summary				
	Date	**Grant Recipients**	**Points of Contact (POCs)**	**Respondents**
PPF 1	4/26/2016	702	941	63
PPF 2	5/12/2016	3,027	3,682	116
PPF 3	6/14/2016	3,795	5,293	59
Total		**7,524**	**9,916**	**238**

For each PPF, HHS found that the number of Points of Contact (POC) exceeded the number of grant recipients because the grant recipient organizations had multiple associated POCs. In an effort to reach all appropriate individuals at an organization, HHS contacted multiple POCs where applicable.

HHS continuously monitored grant recipient responses, feedback, and preferences received from respondents. HHS used the feedback to assign interested respondents to specific pilot test models based on their interest.

Assignment of Diverse Population into Test Models

After the three PPF outreach actions, HHS received responses from 238 POCs interested in one or more of the pilot test models.

The 238 respondents met the minimum sample size of 210 participants (42 participants x 5 pilot test models that require participants)[39] as defined in the "Minimum Sample Size" section above. HHS used the following criteria to assign these respondents the pilot test models:
1. HHS assigned all PPF respondents who expressed interest in a specific test model to that pilot test model.
2. HHS randomly assigned the remaining PPF respondents to pilot test models in the following order to the test models in which respondents expressed interest:
   - Single Audit
   - CDER
   - NOA-POC

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[39] Consolidated Federal Financial Reporting, Learn Grants, CDER Library 1, Single Audit, and Notice of Award. CDER Library 2 does not require grant recipient participation.

- Learn Grants
- CFFR

3. Following the pilot test model lists created from steps one and two, HHS assigned respondents interested in all pilot test models into underserved test models.
4. No respondents were assigned to multiple test models.

The graph below shows the number of participants assigned by test model. Detailed information regarding participants for each test model are available in Appendix H: Grants Pilot Participants.

Figure 10: Assigned Participants by Test Model

Test Model	Assigned Participants
CDER	72
CFFR	43
Single Audit	2
NOA-POC	78
Learn Grants	43

After performing this assignment, HHS then maintained communications with respondents to inform them of their assigned pilot test model, keep them apprised of pilot test model status (via Newsletters), and notified them that HHS was ready to execute the test model.

Diverse population identification and recruitment allowed HHS and OFFM to draw analysis, results, and conclusions from each pilot test model.

Following the assignment process, HHS assigned two participants to the Single Audit test model. Although respondents expressed interest in participating, to qualify a participant needed to be Single Audit eligible (annual Federal expenditure greater than $750,000), have a fiscal year end date after July 1st, and have submitted their Single Audit to the FAC by March 31 in the most recent fiscal year. To increase participation for the Single Audit Test Model, HHS leveraged the FAC database to send additional targeted outreach to those recipients meeting these Single Audit pilot test model criteria.

Additional Single Audit targeted outreach was conducted through emails and phone calls made to over 700 points of contact listed in the FAC. Contacts were sorted chronologically by Single Audit submission date. Emails were then sent to each potential participant by their submission and then each contact received a phone call to follow up on their participation status, gauge interest levels, and answer any remaining questions. This process was conducted multiple times until all potential participants having submission dates until May 2017 were reached.

Paperwork Reduction Act (PRA)

The PRA of 1995 requires that agencies obtain OMB approval before requesting most types of information from the public. "Information collections" include forms, interviews, and recordkeeping requirements, to name a few categories. To execute the pilot test models, HHS complied with the PRA and submitted Pilot DCTs for review, concurrence, and approval by OMB's Office of Information and Regulatory Affairs (OIRA).

HHS initiated the generic PRA clearance process in November 2015 and continued individual test model clearances sequentially in accordance with our project plan through November 2016. Pilot participants could not be recruited and pilot test model execution could not begin until HHS received OIRA approval on each test model.

Pilot Test Model Execution

This section describes two delivery methods used in implementing the pilot test models, the communication process, and the total number of surveys.

Pilot Test Model Delivery Mechanisms

HHS engaged participants in the pilot test models through two different mechanisms – virtual attendance and in-person attendance. In the virtual attendance mechanism, participants performed the test from their respective locations. HHS obtained participants for the virtual tests from the diverse population to meet our minimum sample size of 42 as described above. Participants were obtained for the in-person mechanism as volunteers who were attending pre-scheduled partner organization training events and volunteered to participate in the pilot test model sessions.

To recruit participants for the virtual pilot test model delivery, HHS sent emails (via GovDelivery) with a link to a PPF. The PPF provided a basic overview of each pilot test model and a mechanism for indicating if the grant recipient was interested in participating in one or more of the test models. If a grant recipient responded to the PPF, then HHS considered them a "respondent" and assigned them to a test model.

In order to conduct a virtually-attended pilot test model session, HHS e-mailed the webinar invitation with applicable test instruments (quizzes, test scenarios, and/or DCTs) to the respondents beginning two weeks prior to the test. The webinar provided background on the pilot and the test model. The email also provided instructions for taking the test, links to the pilot test model instruments, and the pilot test model survey, which was administered via an online tool (SurveyMonkey.com). Additionally, this webinar provided respondents the opportunity to ask questions. HHS followed up with these respondents to remind them to submit their survey and confirm their participation.

Virtual Test Model execution is shown below and denotes a total of 12 sessions.

Figure 11: Virtual Test Model Execution

Test Model	Number of Sessions Conducted
CDER 1	2
CFFR ACF Pilot	4
CFFR Facilitated Discussion	1
Single Audit Form Completion	1

NOA-POC	2
Learn Grants	2
Total	12

For in-person test model delivery, HHS provided the test instruments (hard copy format) to the participants at the partner organization training events. At a pilot test model session, HHS presented background on the DATA Act and pilot, and the specific test model. HHS also provided instructions for taking the test, if applicable. At the conclusion of each in-person test, HHS collected the test model surveys, DCTs, and quizzes, as applicable.

In-person test model execution is shown below and denotes a total 10 sessions.

Figure 12: In-Person Test Model Execution

Test Model/In-person Event (Projected as of May 2017)	NGMA 3/2016	AGA 7/2016	NCURA 8/2016	GPA 11/2016	FDP 1/2017	**Total**
CDER 1					1	1
CFFR Facilitated Discussion		1				1
Single Audit Facilitated Discussion	2	1				3
NOA-POC				1	1	2
Learn Grants		1	1	1		3
Total	2	3	1	2	2	10

Survey Totals

HHS collected surveys from participants for each pilot test model. Surveys were HHS's primary source of information for analysis needed for summarizing results, and drawing conclusions. Surveys included questions regarding organization type and size, and included questions related to the test model hypotheses. The total number of surveys received is listed below:

Figure 13: Survey Totals

Test Model	Total Surveys Received
CDER 1	59
CDER 2	Not applicable

Test Model	Total Surveys Received
CFFR - ACF Pilot	115
CFFR - Facilitated Discussion	30
SA - Form Completion	13
SA - Facilitated Discussion	123
NOA – POC	104
Learn Grants	57
Total	501

The analysis results of the surveys, along with other data collected from the pilot test models are presented in grants pilot Section II of this report and more information regarding test model and overall pilot participants is available in Appendix H: Grants Pilot Participants.

Aggregated Dollar Value of Awards for Recipients

The DATA Act requires that to the extent practicable, the pilot should include recipients who receive federal awards from multiple programs across multiple agencies and that the participant population is diverse. In order to meet this requirement, HHS conducted robust outreach and executed the sampling plan as described above. This execution resulted in 501 participants, of which 128 participated in the CFFR-ACF pilot and SA – form completion. Both of these test models allowed recipients to provide data to meet the terms and conditions of their existing awards. The reported aggregate dollar value of current Federal grants for participants of these test models was $122 billion.

APPENDIX H: GRANTS PILOT PARTICIPANTS

Total Grants Pilot Participants

Figure 14: Total Grants Pilot Participants

Type of Recipient	Number	Percentage
Non-Profit	90	18%
Other	63	13%
Federal Government	58	12%
For Profit Organization	12	2%
Higher Education	135	27%
State/Local Government	117	23%
Native American	26	5%
Total	501	100%

Figure 15: Grants Pilot Total Surveys Collected

Test Model	Total Surveys Received
CDER 1	59
CDER 2	Not Applicable
CFFR - ACF Pilot	115
CFFR - Facilitated Discussion	30
SA - Form Completion	13
SA - Facilitated Discussion	123
NOA - POC	104
Learn Grants	57
Total	501

CDER 1 Participants Results

In total, there were 59 participants for this test model. The participant breakdown can be found in Figure 16 below:

Figure 16: CDER Library 1 Participants

Type of Participant	Number	Percentage
Federal government	1	2%
For-profit organization	2	3%
Higher education	32	54%
State/Local Government	19	32%
Non-profit	4	7%
Other	1	2%

CFFR Participant Results

In total, there were 145 participants for this test model. The majority of these participants came from the State and Local government communities. The participant breakdown can be found in Figure 17 below:

Figure 17: CFFR Participant Results

Type of Participant	Number	Percentage
Federal government	11	8%
Higher education	9	6%
State/Local Government	46	32%
Native American	19	13%
Non-profit	37	25%
Other	23	16%

Single Audit Participant Results

In total, there were 136 participants for this test model. The majority of these participants came from the Federal and State or Local government communities. The participant breakdown can be found in Figure 18 below:

Figure 18: Single Audit Participants[40]

Type of Participant	Number	Percentage
Federal government	34	25%
For-profit organization	5	4%
Higher education	12	9%

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[40] For this test model, "other" includes those who indicated themselves as other, as well as those from for-profit organizations, mid or large sized businesses, and non-governmental organizations. Seventeen percent of the 23% in this category filled "other" in their test model survey.

State/Local Government	38	28%
Native American	1	1%
Non-profit	23	17%
Other	1	2%

NOA Participant Results

In total, there were 104 participants for this test model. Additionally, HHS had participation from the Federal government, which was included in the analysis. The participant breakdown can be found in Figure 19 below:

Figure 3: NOA-POC Participants

Type of Participant	Number	Percentage
Federal government	2	2%
Higher education	71	68%
State/Local government	8	8%
Native American	4	4%
Non-profit	11	10%
Other	8	8%

Learn Grants Test Model Participants

In total, there were 57 participants for this test model. Additionally, HHS had participation from the Federal government, which was included in the analysis. The participant breakdown can be found in Figure 20 below:

Figure 20: Learn Grants Participants

Type of Participant	Number	Percentage
Federal government	10	18%
For-profit organization	4	7%
Higher education	11	19%
State/Local Government	6	11%
Native American	2	3%
Non-profit	15	26%
Other	9	16%

APPENDIX I: GRANTS PILOT PARTICIPATION FORM (PPF)

May 2016

DAP — DATA Act Program Management Office

Participate in the Section 5 Grants Pilot!

A message from the United States Department of Health & Human Services DATA Act Program Management Office (DAP).

The deadline for participating in the Section 5 Grants Pilot is **Wednesday, May 11, 2016**. This is an exciting opportunity to help improve the Federal award process for grant recipients like you! By completing the survey and participating, your organization can help identify improvements to Federal financial assistance. Your feedback is an essential component of the Section 5 Grants Pilot!

Please complete the participation survey found in the link below by Wednesday, May 11, 2016 so you may participate in the Section 5 Grants Pilot Test Models!

https://www.surveymonkey.com/r/6YYSMNX

Thank you for your assistance, and remember, this is your chance to be heard by Congress and improve future Federal award processes, forms, and requirements!

Contact us: DATAActPMO@hhs.gov Twitter: @HHS_DAP

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