DATA ACT IMPLEMENTATION PLAN

Table of Contents

Steps towards Implementation

The Nuclear Regulatory Commission (NRC) operates an integrated financial management system FAIMIS (CGI Momentum), and a contract writing system STAQS (Compusearch PRISM). For quality assurance and reporting purposes, the NRC operates a data warehouse (CRISP) which captures many of the data elements from both systems. The NRC's original plan included leveraging CRISP for the purpose of DATA Act reporting. This required updating the data extract files from both systems to include data elements originally required for DATA Act reporting, and loading the additional data elements into CRISP from STAQS and FAIMIS. Once the data was in CRISP, the NRC would create a data file conforming to the DATA Act schema format and submit to the broker. This effort has been discontinued as a result of the major revision to the DATA Act Information Model Schema (DAIMS), released April 29, 2016.

The April 29, 2016 revisions require the NRC to change the approach, which no longer requires any new reporting or additional data elements from the procurement system STAQS. The new approach leverages data currently reported from STAQS to the Federal Procurement Data System – Next Generation (FPDS-NG) and the Award Submission Portal (ASP). This mirrors the current method used to populate USASpending.com. This substantially reduces the effort required to populate procurement information into the DATA Act broker. Additionally, two other government-wide systems will be leveraged by the broker to obtain vendor-provided data, the Federal Subaward Reporting System (FSRS) and, the System for Award Management (SAM).

The DATA Act technical reporting schema requires seven data files as follows: (A) Appropriations Account; (B) Object Class and Program Activity; (C) Award Financial; (D1) Award & Awardee Attributes (Procurement); (D2) Award & Awardee Attributes (Financial Assistance); (E) Additional Awardee Attributes; and, (F) Sub-Award Attributes. As outlined in the April 29 DAIMS changes, the Treasury broker will extract the data for the file D1 from FPDS, file D2 from ASP, file E from SAM, and file F from FSRS, without involvement of the NRC. The NRC will provide files A, B, and C, to the broker extracted from the NRC central accounting system FAIMIS.

The NRC will comply with the DATA Act financial reporting requirements through a two-phase approach. In the first phase, the NRC will used the business intelligence tool Business Objects to extract data from FAIMIS to populate files A, B, & C, and organize the files into a broker-ready format. As of June 2016, the NRC has created these three files and are currently testing them with the broker. The second phase is to upgrade our version of CGI Momentum (FAIMIS) to version 7.4 (currently operating in version 7.1.3). The upgrade is scheduled for May 2017. The upgraded version includes DATA Act reporting functionality. Once we test and stabilize the upgrade, we will configure the DATA Act functionality. While we configure and test the new version of CGI Momentum, the NRC will continue to report to the DATA Act broker using the interim solution. Subsequently, we plan to run parallel until the new version of FAIMIS with DATA Act functionality is ready for production.

NRC's systems use unique award IDs for each commercial contract, interagency agreement and grant/cooperative agreement awarded. This numbering scheme will be adjusted in FY17 to accommodate the new requirements provided in the Federal Acquisition Regulation (FAR). The NRC already uses the Procurement Instrument Identifier (PIID) and Federal Award Identification Number (FAIN) as the common link for transactions between the STAQS and FAIMIS systems. The PIID and FAIN will be used by the Treasury broker to match up financial data with procurement data. A new Award Submission Portal (ASP) file format is also scheduled to be issued and staff will work with Compusearch to update the extract from PRISM.

Foreseeable Challenges

In May 2017, NRC is planning a Momentum upgrade from version 7.1.3. to version 7.4 to adhere to the newly mandated Treasury Invoice Processing Platform (IPP) by the end of 2018. We do not anticipate any field name changes related to DATA Act data. In addition to making NRC ready for IPP, version 7.4 will provide DATA Act reporting functionality which we will transition to from our interim process. The same staff implementing the DATA Act solution will be working on the upgrade of CGI Momentum which may present a challenge. The interim DATA Act reporting solution should mitigate any challenges. Thus, it is important that DATA Act reporting requirements do not change from the April 29 version of DAIMS.

Risks Mitigation Strategy

The primary strategy for mitigating risk is to implement an interim DATA Act reporting solution prior to the Momentum 7.4 upgrade. This will allow the NRC staff the time to perform testing, independent validation and verification (IV&V) and other tasks involved with the upgrade. This will minimize the burden on both NRC and contractor personnel while keeping NRC on track to meet the required completion dates.

Competing Statutory, Regulatory, and Policy Priorities

OMB Memorandum M-15-19, *Improving Government Efficiency and Saving Taxpayer Dollars Through Electronic Invoices*, could cause an issue with resources allocated for the DATA Act project. The same pool of resources will be used for DATA Act, pending system upgrades, and the implementation of IPP. This may lead to project delays or funding issues in order to complete these competing projects.

Managing Costs

Utilizing our current infrastructure will allow NRC to meet the requirements of the DATA Act while avoiding implementation of any major new systems. This should minimize the cost to the agency. The budget will be closely monitored by the implementation team and program staff.
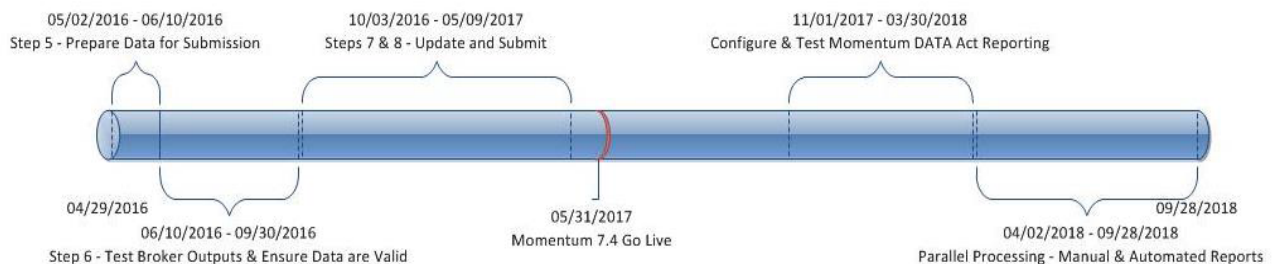
Summary Resource Statement

As of the end of April 2016, the NRC utilized existing staff in its Office of the Chief Financial Officer and the Office of Administration for overall management and planning, identifying the NRC source of the data elements from FAIMIS and STAQS required for reporting under the original government-wide plan, developing the process for assembling that data in a database and sending it to the Treasury broker. While the NRC does not separately track work on the DATA Act solution, the effort to date involved approximately eight staff working 5 to 15 percent of their time on the DATA Act implementation. The NRC also used existing operations and maintenance (O&M) contractors to support DATA Act implementation within established contract ceilings.

Our current estimate is as follows in terms of dollars and FTEs. The NRC FY 2016 budget authorized $740,000 to obligate for the upgrade of Momentum from version 7.1.3 to 7.4, which will include DATA Act reporting functionality. The NRC FY 2017 budget includes a request for $903,000 for DATA Act implementation activities with a minimum requirement of no less than $543,000. The $903,000 would be applied as follows: $703,000 to complete the Momentum upgrade and $200,000 to configure and test the DATA Act reporting functionality of the upgrade. Our total FTE usage which includes the effort of a number of existing staff, part time, is estimated to be: 2.3 FTEs in FY 2016, 2.5 FTEs in FY 2017, and 0.8 FTE in FY 2018. The NRC implementation cost is illustrated in the following chart:
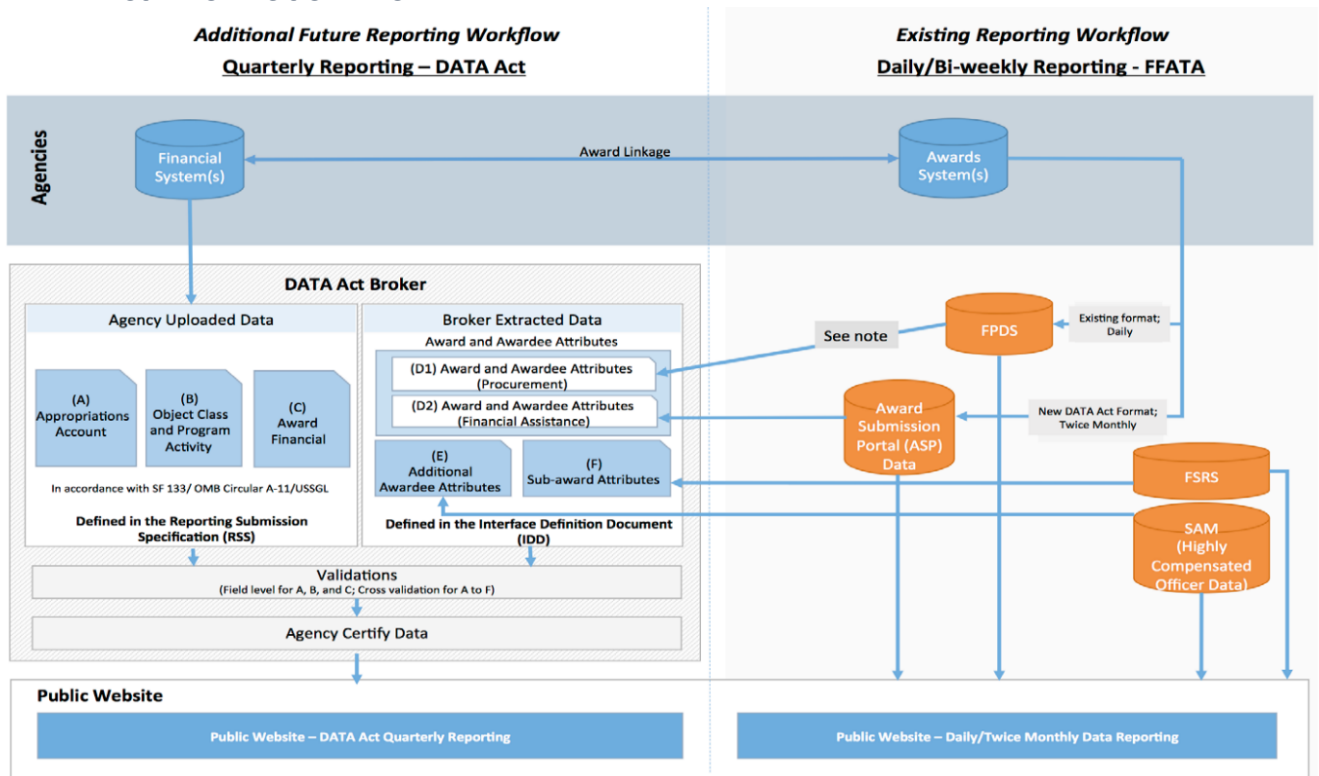
DATA Act Cost Category	FY 2016 $k	FY 2016 FTE	FY 2017 $k	FY 2017 FTE	FY 2018 $k	FY 2018 FTE	TOTAL $k	TOTAL FTE
Transfer data to Treasury broker, test the data extracts in the Treasury broker, and make revision for any errors generated by the broker (Step 6)	0.0	1.3	0.0	0.0	0.0	0.0	**0.0**	**1.3**
Test submission process to Treasury broker, re-test the data transfer process as needed, and submit production data to Treasury (Steps 7-8)	0.0	0.0	0.0	1.0	0.0	0.0	**0.0**	**1.0**
Momentum (FAIMIS) upgrade and testing	740.0	1.0	703.0	1.0	0.0	0.0	**1,483.0**	**2.0**
Configure and test Momentum DATA Act reporting functionality	0.0	0.0	200.0	0.5	0.0	0.5	**200.0**	**1.0**
Parallel processing of Momentum functionality and interim DATA Act reporting solution	0.0	0.0	0.0	0.0	0.0	0.3	**0.0**	**.3**
TOTAL CONTRACT DOLLARS & FTE	**740.0**	**2.3**	**903.0**	**2.5**	**0.0**	**0.8**	**1,683.0**	**5.6**
FTE DOLLAR COST	**350.4**		**392.5**		**127.2**		**870.1**	
TOTAL COST PER FISCAL YEAR	**1,090.4**		**1,295.5**		**127.2**		**2,553.1**	

Timeline

Our timeline illustrates how the NRC will meet the statutory deadlines for implementation of the DATA Act and remaining steps as outlined in the DATA Act Implementation Playbook.

DATA Act Information Flow

Additional Future Reporting Workflow
Quarterly Reporting – DATA Act

Existing Reporting Workflow
Daily/Bi-weekly Reporting - FFATA

Agencies

Financial System(s)

Award Linkage

Awards System(s)

DATA Act Broker

Agency Uploaded Data

Broker Extracted Data
Award and Awardee Attributes

(A) Appropriations Account

(B) Object Class and Program Activity

(C) Award Financial

(D1) Award and Awardee Attributes (Procurement)

(D2) Award and Awardee Attributes (Financial Assistance)

(E) Additional Awardee Attributes

(F) Sub-award Attributes

In accordance with SF 133/ OMB Circular A-11/USSGL

Defined in the Reporting Submission Specification (RSS)

Defined in the Interface Definition Document (IDD)

See note

FPDS

Existing format; Daily

Award Submission Portal (ASP) Data

New DATA Act Format; Twice Monthly

FSRS

SAM (Highly Compensated Officer Data)

Validations
(Field level for A, B, and C; Cross validation for A to F)

Agency Certify Data

Public Website

Public Website – DATA Act Quarterly Reporting

Public Website – Daily/Twice Monthly Data Reporting

Note: For May 2017 implementation, D1 will be extracted from the USAspending site which pulls data from FPDS daily. D1 will be pulled from FPDS directly in the long term.

High Level Project Plan

The attached NRC DATA Act Implementation Project Plan shows how the NRC plans to meet the statutory deadlines for implementation of the DATA Act as well as all other requirements outlined by OMB and Treasury.

NRC DATA Act Implementation Project Plan
(Revised August 2016)

ID	Task Name	Start	Finish	
				04
1	Revised DATA Act Information Model Schema (DAIMS) Issued by Treasury/OMB [includes the Reporting Submission Specification (RSS) and the	Fri 04/29/16	Fri 04/29/16	
2	Review RSS and IDD and revise data mapping as appropriate	Fri 04/29/16	Fri 05/13/16	
3	Map data elements from financial system (Momentum), extract amd prepare Files B & C as defined in the RSS using Business Objects; prepare	Fri 05/13/16	Fri 06/10/16	
4	Update DATA Act Implementation Plan as required by OMB	Wed 06/15/16	Fri 08/12/16	
5	Receive new ASP file format and work with Compusearch to update extract from PRISM	Mon 08/01/16	Wed 11/30/16	
6	**STEP 6: TEST BROKER OUTPUTS AND ENSURE DATA ARE VALID**	**Fri 06/10/16**	**Fri 09/30/16**	
7	Identify method to transfer data between agency and Treasury broker	Fri 06/10/16	Fri 06/10/16	
8	Test data extracts in the Treasury broker	Fri 06/10/16	Fri 09/30/16	
9	Make revisions to data extracts to correct for any errors generated by the Treasury broker	Fri 06/10/16	Fri 09/30/16	
10	**STEPS: 7 - 8: UPDATE AND SUBMIT**	**Mon 10/03/16**	**Tue 05/09/17**	
11	Test submission process to Treasury	Mon 10/03/16	Tue 05/09/17	
12	Re-test data transfer process as needed	Mon 10/03/16	Tue 05/09/17	
13	SUBMIT PRODUCTION DATA TO TREASURY	Tue 05/09/17	Tue 05/09/17	
14	**DATA Act Deadline --- Federal Agencies must Implement Government-wide Data Standards; OMB/Treasury to Ensure that the Required Financial Information is Posted on the USAspending.gov Website NLT this date and at Least Quarterly Thereafter**	Tue 05/09/17	Tue 05/09/17	
15	**NRC PERMANENT SOLUTION DEVELOPMENT**	**Mon 10/03/16**	**Fri 09/28/18**	
16	Implement Momentum upgrade from Version 7.1.3 to 7.4 and GO LIVE	Mon 10/03/16	Wed 05/31/17	
17	Configure and test Momentum DATA Act reporting functionality	Wed 11/01/17	Fri 03/30/18	
18	Parallel processing of Momentum and interim DATA Act reporting functionality	Fri 03/30/18	Fri 09/28/18	
19	**AUDIT / REVIEW OF IMPLEMENTATION**	**Wed 11/09/16**	**Wed 05/09/18**	
20	IG issues an assessment of NRC's progress implementing the DATA Act requirements	Wed 11/09/16	Wed 11/09/16	
21	**DATA Act Deadline --- OMB Submits Report to Congress on Results of the Pilot Program and any Recommendations for Simplifying Reporting Requirements**	Wed 08/09/17	Wed 08/09/17	
22	**DATA Act Deadline --- IG Submits Report to Congress on the Completeness, Timeliness, Quality, and Accuracy of a Sample of Agency Data from the USAspending.gov Website**	Thu 11/09/17	Thu 11/09/17	
23	**DATA Act Deadline --- Comp Gen Submits to Congress a Report that Assesses and Compares the Completeness, Timeliness, Quality, and Accuracy of Data Across Reporting Agencies**	Thu 11/09/17	Thu 11/09/17	
24	**DATA Act Deadline --- OMB/Treasury Must Ensure that Information Posted on the USAspending.gov Website Conforms to Governement-wide Data Standards NLT than this Date**	Wed 05/09/18	Wed 05/09/18	
25	**GRANTS**	**Fri 05/08/15**	**Thu 08/09/18**	
26	**DATA Act Deadline --- OMB or Agency Designees Establishes a Two-Year Pilot Program to Study Ways to Simplify Financial Reporting by Federal Award Recipients**	Fri 05/08/15	Fri 05/08/15	
27	**DATA Act Deadline --- OMB Issues Guidance to Agencies as How to Implement Government-wide Data Standards for Federal Award Recipient Reporting**	Thu 08/09/18	Thu 08/09/18	