

OMB REPORT TO THE CONGRESS  
ON IMPLEMENTATION OF  
THE FOREIGN AID TRANSPARENCY AND  
ACCOUNTABILITY ACT (FATAA)



FEBRUARY 15, 2019

## I. Introduction

### a. Summary

This report fulfills the requirement set forth in Section 4(b)(4) of the [Foreign Aid Transparency and Accountability Act of 2016 \(FATAA\), Public Law 114-191](#). The statutory requirement under Section 4 is for the Director of the Office of Management and Budget (OMB), in consultation with the head of such department or agency, to submit a consolidated report on Federal department or agency compliance with the requirements under paragraph (1), (2), or (3) of subsection (a), or subsection (c), with respect to providing information described in subsection (a).

OMB, working with the Department of State and in consultation with all 22 affected agencies, conducted a review covering these agencies' compliance with FATAA requirements. While FATAA covers only certain agencies, programs, and accounts, the Administration determined for the purposes of FATAA implementation and this compliance report that all agencies administering foreign assistance as defined in [OMB Bulletin 12-01](#) should comply with foreign assistance reporting policies and practices as required by FATAA. Consequently, the Administration has conducted a comprehensive review against FATAA's section 4 requirements in line with previous foreign assistance definitional and reporting requirements, as outlined in OMB Bulletin 12-01. This assessment, including notes and footnotes, reflects agency reporting activity through July 15, 2018.

### b. Applicable Legislative Language

#### SEC. 4. INFORMATION ON COVERED UNITED STATES FOREIGN ASSISTANCE PROGRAMS.

##### (a) PUBLICATION OF INFORMATION.—

(1) UPDATE OF EXISTING WEBSITE.—Not later than 90 days after the date of the enactment of this Act, the Secretary of State shall update the Department of State's website, "ForeignAssistance.gov", to make publicly available comprehensive, timely, and comparable information on covered United States foreign assistance programs, including all information required under subsection (b) that is available to the Secretary of State.

(2) INFORMATION SHARING.—Not later than 2 years after the date of the enactment of this Act, and quarterly thereafter, the head of each Federal department or agency that administers covered United States foreign assistance shall provide the Secretary of State with comprehensive information about the covered United States foreign assistance programs carried out by such department or agency.

(3) UPDATES TO WEBSITE.—Not later than 2 years after the date of the enactment of this Act, and quarterly thereafter, the Secretary of State shall publish, on the "ForeignAssistance.gov" website or through a successor online publication, the information provided under subsection (b).

##### (b) MATTERS TO BE INCLUDED.—

(1) IN GENERAL.—The information described in subsection (a)—

(A) shall be published for each country on a detailed basis, such as award-by-award; or

(B) if assistance is provided on a regional level, shall be published for each such region on a detailed basis, such as award-by-award.

(2) TYPES OF INFORMATION.—

(A) IN GENERAL.—To ensure the transparency, accountability, and effectiveness of covered United States foreign assistance programs, the information described in subsection(a) shall include—

- (i) links to all regional, country, and sector assistance strategies, annual budget documents, congressional budget justifications, and evaluations in accordance with section 3(c)(2)(J);
- (ii) basic descriptive summaries for covered United States foreign assistance programs and awards under such programs; and
- (iii) obligations and expenditures.

(B) PUBLICATION.—Each type of information described in subparagraph (A) shall be published or updated in the appropriate website not later than 90 days after the date on which the information is issued.

(C) RULE OF CONSTRUCTION.—Nothing in this paragraph may be construed to require a Federal department or agency that administers covered United States foreign assistance to provide any information that does not relate to, or is not otherwise required by, the covered United States foreign assistance programs carried out by such department or agency.

...

(4) FAILURE TO COMPLY.—If a Federal department or agency fails to comply with the requirements under paragraph (1), (2), or (3) of subsection (a), or subsection (c), with respect to providing information described in subsection (a), and the information is not subject to a determination under subparagraph (A) or (B) of paragraph (3) not to make the information publicly available, the Director of the Office of Management and Budget, in consultation with the head of such department or agency, not later than one year<sup>1</sup> after the date of the enactment of this Act, shall submit a consolidated report to the appropriate congressional committees that includes, with respect to each required item of information not made publicly available—

- (A) a detailed explanation of the reason for not making such information publicly available; and
- (B) a description of the department’s or agency’s plan and timeline for—
  - (i) making such information publicly available; and
  - (ii) ensuring that such information is made publicly available in subsequent years.

(c) SCOPE OF INFORMATION.—The online publication required under subsection (a) shall, at a minimum—

- (1) in each of the fiscal years 2016 through 2019, provide the information required under subsection (b) for fiscal years 2015 through the current fiscal year; and
- (2) for fiscal year 2020 and each fiscal year thereafter, provide the information required under subsection (b) for the immediately preceding 5 fiscal years in a fully searchable form.

## II. Compliance Requirements

### a. FATAA Compliance Indicators

FATAA requires agencies to comply with seven distinct foreign assistance data reporting requirements by no later than two years after the enactment of the bill (July 15, 2018). They include:

- |              |                 |
|--------------|-----------------|
| i. Award     | iii. Budget     |
| ii. Strategy | iv. Evaluations |

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<sup>1</sup> In consultation with Congress, OMB determined the deadline for its section 4 report should match that of the agencies’ reporting requirements.

- v. Descriptions
- vi. Baseline

vii. Transaction-Level Reporting

For each of the FATAA reporting requirements, except where noted otherwise, OMB’s assessment of the agency’s compliance falls into the following four categories:

- **Yes** – For the portfolios reported by the agency, the agency is compliant with this aspect of FATAA ahead of statutory deadline.
- **No** – For the portfolios reported by the agency, the agency is NOT compliant or an agency is not onboarded<sup>2</sup>, in which case we note the agency.
- **Partial** – For the portfolios reported by the agency, the agency is partially compliant.
- **N/A** – not applicable. The agency did not administer a foreign assistance program during the reporting period or items were redacted.<sup>3</sup>

i. **Award**

Sec. 4(b)(1)(A) requires agencies to report on an award-by-award basis. This includes all mechanism types including grants, contracts, cooperative agreements, public private partnerships, interagency transfers, and other mechanism types used by an agency.

ii. **Strategies**

Sec. 4(b)(2)(A)(i) requires agencies to provide links to [foreignassistance.gov](http://foreignassistance.gov) for their regional, sector, or country strategies. These links can be provided in multiple ways to meet this requirement. These ways include a) providing individual links to strategies to be included in the IATI XML files coded and posted to the registry; b) providing a singular link to a clearinghouse or webpage already in existence and hosted by an agency; or c) providing information in both ways, option a and b. Many agencies have portions of their strategies that are classified. However, agencies should make a best effort to provide unclassified portions. If an agency is unable to publish any portion of a strategy, then the agency is required to report this redaction to Congress in accordance with Sec. 4(b)(3) Report in Lieu of Inclusion.

iii. **Budget**

Sec. 4(b)(2)(A)(i) requires agencies to provide budgetary information. This can include budget documentation, planning documents, and the Congressional Budget Justification (CBJ). For an agency to receive a “Yes,” at a minimum it must provide CBJ information for Fiscal Year (FY) 2017 – FY 2018 or make it clear that its funding is not directly appropriated and it comes through transfers from agencies who do produce budgetary information. Those agencies that do not receive direct foreign assistance appropriations and therefore do not have CBJ figures automatically receive a “Yes.”

iv. **Evaluations**

Sec. 4(b)(2)(A)(i) requires agencies to provide links to [foreignassistance.gov](http://foreignassistance.gov) for their evaluations to the standard set forth in section 3(c)(2)(J). Agencies may conduct evaluations at the level appropriate based on their business model, however agencies must provide links to the evaluations made publicly available per section 3(c)(2)(J) to [foreignassistance.gov](http://foreignassistance.gov) by a) providing individual links to evaluations to be included in the IATI XML files coded and posted to the registry; b) providing a singular link to the locations where evaluations are made public and shared; or c) providing information in both ways, option a and b. If an agency is unable to publish any portion of an evaluation, then the agency is required to report this redaction to Congress.

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<sup>2</sup> Definition of “onboarded:” Agencies who have at least one year of data available publicly on the [foreignassistance.gov](http://foreignassistance.gov) website and are reporting on a quarterly basis.

<sup>3</sup> The Export-Import Bank (“EXIM Bank”) reported that it did not administer a foreign assistance program during the applicable reporting period, beginning with the base year of FY 2015.

v. **Descriptions**

To promote the meaningful use of the data produced under FATAA, Sec. 4(b)(2)(A)(ii) requires agencies to provide a basic description to accompany the transaction data. A basic description should be free of excessive acronyms and include information to allow the public to understand the program/project/award. As a benchmark, a length of over 40 characters is generally accepted.

vi. **Baseline**

Sec. 4(c)(1) requires all agencies to adhere to a standard baseline of FY 2015. Agencies are required to report FY 2015 as the base year for each of their portfolios and to report quarterly data thereafter. This is a binary indicator. To receive a “Yes” in this indicator, all of the agency’s portfolios must be reporting starting in FY 2015. If the agency does not report on all its portfolios starting in FY 2015, then the agency receives a “No.”

vii. **Transaction-Level Reporting**

Sec. 4(b)(2)(A)(iii) requires agencies to report information on a transaction level (obligations and disbursements). An individual transaction can refer to an obligation, disbursement, expenditure, or other approved transaction type.

FATAA Indicators							
	Award	Strategies	Budget**	Evaluations	Descriptions	Baseline	Obligations & Disbursements
African Development Foundation	Yes	Yes	Yes	No	Yes	Yes	Yes
Department of Agriculture	Yes	No	Yes	No	Yes	Yes	Yes
Department of Commerce	Yes	No	Yes	No	Yes	No <sup>4</sup>	Yes
Department of Defense	Partial	Yes	Partial	No	Yes	No <sup>5</sup>	No
Department of Energy	Yes	N/A <sup>6</sup>	Yes	N/A <sup>7</sup>	Yes	Yes	Yes
Department of Health and Human Services	Yes	No	Partial	No	Yes	No <sup>8</sup>	Yes
Department of Homeland Security	Yes	No	Yes	No	Yes	Yes	Yes
Department of Interior	Yes	Yes	Yes	No	Yes	Yes	Yes
Department of Justice	Yes	No	Yes	No	Yes	No <sup>9</sup>	Yes
Department of Labor	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Department of State	Yes	Yes	Yes	Yes	Partial	No <sup>10</sup>	Yes

<sup>4</sup> Commerce is missing FY 2015 and FY 2016 data.

<sup>5</sup> DoD is missing 12 of its 22 portfolios and all FY 2015 data.

<sup>6</sup> DoE's National Nuclear Security Administration (NNSA) does not publish strategies and evaluations of its programs due to national security concerns. It has submitted a redaction justification to the Secretary of State per Section 4(b)(3) of FATAA.

<sup>7</sup> ibid

<sup>8</sup> HHS is missing one of its portfolios: The Office of the Assistant Secretary for Preparedness and Response (ASPR).

<sup>9</sup> DOJ is missing one of its portfolios: The Federal Bureau of Investigation (FBI).

<sup>10</sup> State is missing three of its portfolios: Security Assistance, Humanitarian Assistance, and Contributions to International Organizations.

FATAA Indicators							
	Award	Strategies	Budget**	Evaluations	Descriptions	Baseline	Obligations & Disbursements
Department of Transportation	Yes	Yes	Yes	No	Yes	Yes	Yes
Department of Treasury	Yes	Yes	Yes	No	Yes	Yes	Yes
Environmental Protection Agency*	No	No	No	No	No	No	No
Export-Import Bank <sup>11</sup>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Federal Trade Commission*	No	No	No	No	No	No	No
Inter-American Foundation	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Millennium Challenge Corporation	Yes	Yes	Yes	Yes	No	Yes	Yes
Overseas Private Investment Corporation	Yes	No	Yes	No	Yes	Yes	No
Peace Corps	Yes	Yes	Yes	Yes	No	Yes	Yes
U.S. Agency for International Development	Yes	Yes	Yes	Yes	Yes	Yes	Yes
U.S Trade and Development Agency*	No	No	No	No	No	No	No

\* Indicates agencies that are not onboarded to ForeignAssistance.gov and are therefore not reporting quarterly.

\*\* Agencies that do not have budget data because their foreign assistance funding is made available through interagency transfers receive an automatic yes on "Budget." These includes the Departments of Commerce, Justice, Homeland Security, and Transportation.

<sup>11</sup> The Export-Import Bank ("EXIM Bank") reported that it did not administer a foreign assistance program during the applicable reporting period, beginning with the base year of FY 2015.

## b. Agency Engagement Indicators

In addition to the seven FATAA data content requirements, FATAA also sets forth a standard schedule for updating datasets, as well as an expectation of general quality and completeness. OMB assessed agencies' general engagement with respect to data reporting against an additional four dimensions as outlined below with the most recent performance weighing more heavily on the score:

- |               |                     |
|---------------|---------------------|
| i. Timeliness | iii. Responsiveness |
| ii. Quality   | iv. Completeness    |

### i. Timeliness

Agencies are required by FATAA to provide the data required in Part I above on a quarterly basis. For the purposes of this review, agencies were assessed for timeliness over their entire reporting period from FY 2015 onward, which is the base year required for FATAA. This indicator is cumulative from the time each agency began reporting to present and considers reporting timeliness for all foreign assistance portfolios.

- On Time – Agencies provide their initial data submissions on time or up to within one month of the deadline.
- Delayed – Agencies provide their initial data submissions one to five months past the deadline.
- Significantly Delayed – Agencies provide their initial data submissions later than five months past the deadline.
- Partial – the agency replies in a timely manner on only part of its portfolios.
- Not Applicable – For those agencies not onboarded.

### ii. Quality

Data quality is a multi-dimensional component. When discussed in this context, data quality refers to required data fields being provided in a consistent manner, level of confidence in the accuracy of the data, and number of rounds of feedback needed with the ForeignAssistance.gov team. Quality is only assessed against agency data from FY 2015 onward to align with the baseline reporting requirement in FATAA. Data prior to FY 2015 is not assessed.

- High – Agency provides data with fields correctly and consistently reported, limited to no updates or rounds of feedback with the ForeignAssistance.gov team needed, with high levels of accuracy as demonstrated by representation of data across multiple sources.
- Medium – Agency generally provides data with fields reported correctly and consistently, two or more rounds of feedback with the ForeignAssistance.gov team are required, and the data is generally accurate.
- Low – Agency provides data with frequent blanks or issues with logic association, considerable updates and rounds of feedback with the ForeignAssistance.gov team occur, and accuracy of the data is poor.
- Not Applicable – For those agencies not onboarded.

### iii. Responsiveness

Engagement measures the level of consistent interaction and response time between an agency and the ForeignAssistance.gov team. While agencies might be timely with their initial submissions, responsiveness accounts for updates and edits they need to make based on review by the team. All foreign assistance portfolios are considered in the agencies' scores. As such, one portfolio may account for a lower overall score. In the case of those agencies not onboarded, the

score reflects their level of responsiveness in working with the ForeignAssistance.gov team to prepare for onboarding.

- Consistent – Agencies reply to inquiries ForeignAssistance.gov team within 1-7 days
- Intermittent – Agencies typically reply to inquiries ForeignAssistance.gov team regularly, but with frequent delays, at times over a week to three weeks
- Partial – the agency replies consistently on only part of its portfolios.
- Non-Responsive – Agencies take over three weeks to respond to inquiries or requests for updated information.

**iv. Completeness**

Agencies are required to provide reporting on all of their foreign assistance portfolios. A portfolio is defined as a program or office that administers foreign assistance as defined by OMB Bulletin 12-01.

- Yes – Onboarded agency reports all known foreign assistance portfolios.
- No – Onboarded agency does not yet report all known foreign assistance portfolios.
- Not Applicable – For those agencies not onboarded.

Engagement Indicators				
	Timeliness	Quality	Responsiveness	Completeness
African Development Foundation	On-time	High	Consistent	Yes
Department of Agriculture	On-time	High	Consistent	Yes
Department of Commerce	Delayed	Medium	Intermittent	Yes
Department of Defense	Significantly Delayed	Low	Consistent	No
Department of Energy	On-time	High	Consistent	Yes
Department of Health and Human Services	Partial	Medium	Partial	No
Department of Homeland Security	On-time	High	Consistent	Yes
Department of Interior	On-time	High	Consistent	Yes
Department of Justice	On-time	Medium	Consistent	No
Department of Labor	On-time	High	Consistent	Yes
Department of State	Significantly Delayed	Low	Consistent	No
Department of Transportation	Delayed	High	Intermittent	Yes
Department of Treasury	Partial	Medium	Partial	Yes
Environmental Protection Agency*	N/A	N/A	Non-responsive	N/A
Export-Import Bank <sup>12</sup>	N/A	N/A	Consistent	N/A
Federal Trade Commission*	N/A	N/A	Non-responsive	N/A
Inter-American Foundation	On-time	High	Consistent	Yes
Millennium Challenge Corporation	Significantly Delayed	Medium	Consistent	Yes
Overseas Private Investment Corporation	On-time	High	Consistent	Yes
Peace Corps	On-time	High	Consistent	Yes
U.S. Agency for International Development	On-time	High	Consistent	Yes
U.S. Trade and Development Agency*	N/A	N/A	Non-responsive	N/A

\* Indicates agencies that are not onboarded to ForeignAssistance.gov and therefore not reporting quarterly.

<sup>12</sup> The Export-Import Bank (“EXIM Bank”) reported that it did not administer a foreign assistance program during the applicable reporting period, beginning with the base year of FY 2015.

## Annex I – Agency Responses Addressing any Non-Compliance to Section 4 of FATAA

<b>African Development Foundation</b>	No response
<b>Department of Agriculture</b>	No response
<b>Department of Commerce</b>	<p><b>Compliance requirements – FATAA Indicators</b>                  The Department of Commerce (DOC) is committed to adhering to the applicable laws in accordance with the Foreign Assistance and Accountability Act of 2016, OMB Bulletin 12-01, and as further revised in OMB memo M-18-04. Prior to FY 2018, the four DOC bureaus: Departmental Management - Commercial Law Development Program, International Trade Administration, National Oceanic and Atmospheric Administration and the U.S. Patent and Trademark Office reported independently and provided information only on an annual basis. The Department is now working to submit thorough agency consolidated submissions that have been properly vetted and approved. Information is also being collected with more frequency, thereby invoking buy-in and participation from the bureaus. Finally, the DOC leadership is actively involved in ensuring that compliance has been met and that the FATAA indicators have been identified.</p> <p><b>Compliance requirements – Engagement Indicators</b>                  The Department of Commerce has provided the FY 2018 data in a timely manner. DOC has currently opened the lines of communications and engagement has vastly improved over the last year, in addition to more robust and comprehensive agency consolidated reporting.</p>
<b>Department of Defense</b>	<p><b>Compliance requirements – FATAA Indicators</b>  <u>Justification for Partial Awards compliance reporting.</u> Most Department of Defense (DoD) programs are reported at the program level, not the award level. DoD Foreign Assistance programs typically transfer funds to the Geographic Combatant Commands, which do not issue contracts to vendors to execute mission requirements. With regard to the Geographic Combatant Commands that do issue contracts to execute mission requirements, the DoD was unaware transactions must be reported at the award-by-award transaction level basis. The Defense Security Cooperation Agency will take action to gather this data from the relevant program offices to obtain award transaction level information to remedy this discrepancy.</p>



<b>Department of Energy</b>	Fully compliant: no response required.
<b>Department of Health and Human Services</b>	<p><b>Compliance requirements – FATAA Indicators</b></p> <p><u>Strategies.</u> The Department of Health and Human Services has a variety of strategies that relate to global health at large. Most of these strategies include both foreign assistance and HHS appropriated programs/ activities. These strategies can be found online, but are not kept in a singular location. There was a recent GAO report that showed the multitude of strategies that included some aspect of foreign assistance.</p> <p><u>Budget.</u> HHS posts Congressional Justifications for each Operating and Staff Division publicly online. All foreign assistance funds come through interagency transfers from DoS, and USAID, which are posted online. This meets the statutory requirement in FATAA.</p> <p><u>Evaluations.</u> According to M-18-04 “Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance,” agencies have until January 2019 to establish specific policies and procedures for monitoring and evaluation of covered foreign assistance. The deadline is “no later than one year after these guidelines are published,” and M-18-04 was released January 11, 2018. HHS is working to meet this deadline and is looking forward to sharing the Department’s plan for a robust monitoring and evaluation process.</p> <p><u>Baseline.</u> Retroactively providing baseline data for 2015 is a time-intensive exercise that would require significant resources that were not provided in the legislation. HHS is committed to providing timely data on a quarterly basis moving forward.</p> <p><b>Compliance requirements – Engagement Indicators</b></p> <p>HHS strives to closely adhere to the deadlines established by FA.gov for providing these reports. HHS is also committed to working with FA.gov and OMB to continually improve data quality. The relevant Operating Divisions (including CDC) have been responsive to data concerns, and have worked to meet the data requirements despite the constraints imposed by their financial systems, which do not mirror the data template provided by FA.gov.</p>
<b>Department of Homeland Security</b>	<p><b>Compliance requirements – FATAA Indicators</b></p> <p>In addressing strategies or evaluations, State and OMB assessed DHS has not made these elements, where they exist, publicly available.</p> <p><u>Strategies.</u> DHS does not have its own statutory authority to provide security sector assistance (SSA) and relies upon funding from the Departments of State and Defense for support. DHS provides planning and budgeting recommendations to State</p>

	<p>and Defense, which they incorporate into their Departments’ published plans and budgeted activities. DHS does not publish separate, unclassified SSA plans and strategies.</p> <p><u>Evaluations.</u> When implementing State or Defense funded SSA activities, DHS provides subject matter experts to prepare SSA evaluations. Similar to SSA strategic planning documents, DHS provides its SSA evaluations to State and Defense for incorporation into State and Defense documents. In some areas, DHS prepares independent classified evaluations of foreign counterpart capabilities, but DHS cannot make these evaluations publicly available without compromising the security of the homeland, our friends and partners. OMB and State have previously stated an intent to issue guidance on how agencies should make appropriate redacted information publicly available; however, neither OMB nor State have published uniform guidance to inform this process. DHS intends to comply with the guidance once issued.</p>
<p><b>Department of Interior</b></p>	<p><b>Compliance requirements – FATAA Indicators</b></p> <p><u>Evaluations.</u> USFWS does not currently have an evaluation process in place. As such, we are unable to make this information publicly available. USFWS is currently in the preliminary stages of creating an evaluation process, and hope to have it completed by the end of 2019. As soon as an evaluation process is in place we will provide a link to this information to FA.gov to ensure it is made publicly available for all subsequent years.</p>
<p><b>Department of Justice</b></p>	<p><b>Compliance requirements – FATAA Indicators</b></p> <p>Of the seven FATAA indicators, the Department of Justice (DOJ) received “No” for Strategies, Evaluations, and Baseline. <u>Baseline,</u> DOJ provided FY 2015 baseline data for all but one of its components. DOJ plans to provide the FY 2015 for that component within next 30 days. For Strategies, as DOJ does not receive direct foreign assistance funding in our appropriations, DOJ does not have strategies focused on foreign assistance. However, in our new Strategic Plan, which is available online, DOJ does lay out strategies that we will employ with our foreign partners to combat crimes here and aboard. Specific references include:</p> <ul style="list-style-type: none"> <li>• Strategic Goal 1, Strategy 2: Share intelligence with national security partners - on sharing of information with our international partners; support of foreign government efforts to investigate and prosecute terrorists; and building of capacity of foreign governments to investigate and prosecute terrorism cases</li> <li>• Strategic Goal 3 states the Department’s support for the Executive Order on Transnational Criminal Organizations by stating that it will “enhance cooperation with foreign counterparts against transnational criminal organizations and subsidiary organizations, including, where appropriate and permitted by law, through sharing of intelligence and law enforcement information and through increased security sector assistance to foreign partners by the Attorney General and the Secretary of Homeland Security.”</li> </ul>

	<p>For Evaluation, DOJ does not have a Department-wide evaluation policy. Additionally, the majority of our foreign assistance program or work is funded through other agencies, particularly the Department of State, via interagency agreements. Any monitoring and evaluation of these programs should be the responsibility of the funding agencies. For other programs that we may categorize as “foreign assistance,” they are often related to training of our foreign law enforcement partners and are considered law enforcement sensitive and therefore, should not be made available to the public.</p> <p><b>Compliance requirements – Engagement Indicators</b>  For the Engagement Indicators, DOJ received “No” for Completeness. The one DOJ component that has not provided the FY 2015 baseline data will provide all the necessary data, including FY 2015, within next 30 days. DOJ strives to provide a timely and completed data.</p>
<p><b>Department of Labor</b></p>	<p>Fully compliant: no response required.</p>
<p><b>Department of State</b></p>	<p><b>Compliance requirements – Engagement and FATAA Indicators</b>  State does not disagree with the assessment or its score.</p> <p><u>On transaction descriptions and timeliness.</u> The FADR process is projected to be completed by FY 2022, at which point all Department procurement and assistance tools, as well as Department financial databases, will be augmented to better capture foreign assistance data at the country and sector level. This information will be reported quarterly. Additionally, F will lead in providing training to Department staff on entering data into these tools to improve quality of transaction descriptions and other data.</p> <p><u>On Baseline data and completeness.</u> State is currently not fully reporting some portfolios to ForeignAssistance.gov (including in the baseline year), but F and CGFS are actively working with multiple bureaus to improve data capture and publication of outstanding portfolios; one of these portfolios, Humanitarian Assistance, will be posted on the site in the coming months.</p> <p><u>On Data Quality.</u> The Office of U.S. Foreign Assistance Resources (F) has been leading the Foreign Assistance Data Review (FADR) within the Department, working primarily with the Bureau of the Comptroller and Global Financial Services (CGFS) and the Bureau of Administration (A) to help improve the quality of foreign assistance data that is reported into and extracted from Department of State procurement and financial systems. In FY 2017, improvements under the FADR process resulted in over 395,000 additional rows of data totaling over \$11 billion in financial transactions added to ForeignAssistance.gov.</p>

<p><b>Department of Transportation</b></p>	<p><b>Compliance requirements – FATAA Indicators</b>  The Department of Transportation is currently in the process of developing evaluations that meet the requirements of the OMB FATAA Compliance Report.</p> <p><b>Compliance requirements – Engagement Indicators</b>  As the Department of Transportation (DOT) was recently on-boarded over the last year, processes for requesting, compiling, and submitting the datasets from 2015 were developed and implemented. As staff have become more familiar with the reporting schedule, and program datasets for subsequent years provided, we expect DOT reporting to be on-time.</p>
<p><b>Department of Treasury</b></p>	<p>The Treasury Department is committed to complying with the Office of Management and Budget’s (OMB) foreign assistance reporting policies, consistent with OMB Bulletin No. 12-01 of September 25, 2012 and subsequent OMB guidance as well as the Foreign Assistance Transparency and Accountability Act. Treasury’s provision of foreign assistance is traditionally divided into two components. The first, and largest, is composed of the funds provided to multilateral development institutions such as the World Bank and the regional development banks and multilateral trust funds. The second consists of the bilateral assistance provided by the Office of Technical Assistance (OTA). Treasury’s response to the OMB Report to the Congress on Implementation of the Foreign Aid Transparency and Accountability Act will address each component.</p> <p><b>Compliance requirements – FATAA Indicators</b>  <u>Strategies.</u> With respect to its financial contributions to the multilateral development banks and other multilateral funds (“MDBs”), Treasury intends to apply a disclosure policy consistent with the policy adopted for evaluations (see next item). The approach will account for the fact that the banks and funds to which Treasury contributes funding generally employ a range of strategies covering countries, regions, and sectors. Similarly, OTA is currently reviewing its technical assistance project/engagement planning documents in consideration of the FATAA requirement. Any adjustments to those documents, which currently provide comprehensive information on each OTA project, will take into account OTA’s small size and the fact that OTA projects are focused on a sub-set of a sector (finance) rather than a country, region or sector.</p> <p><u>Evaluations.</u> Under interagency evaluation guidelines issued by OMB in January 2018, Treasury is in the process of developing an evaluation policy for its funding to the MDBs. The policy, which is expected to be completed by the end of 2018, will outline Treasury’s evaluation approach, including the publication of evaluation reports. Treasury’s approach will account for the fact that the banks and funds it funds typically have robust monitoring and evaluation programs that are consistent with, and in many places exceed, the interagency guidelines, and include the publication of evaluation reports. Similarly, OTA is currently reviewing its monitoring and evaluation framework in consideration of the FATAA requirement.</p>

	<p><b>Compliance requirements – Engagement Indicators</b></p> <p><u>Timeliness and Responsiveness.</u> Treasury was one of the first agencies reporting to the “Foreign Aid Dashboard” on the assistance provided to multilateral institutions and funds and to countries through the OTA. The timeliness and responsiveness of reporting on assistance to the MDBs has fallen short of OMB expectations in certain instances due to Treasury staff turnover and the nature of the reporting requirements. Treasury is in the process of developing a training manual for foreign aid reporting that will address this deficiency.</p> <p><u>“Medium” data quality.</u> Treasury is unable to respond to the score of “medium” for data quality without knowing the individual score of each office in the portfolio – MDB and OTA. Regarding OTA data, the ratio of errors in the data set to the volume of data being provided is very low – approximately 1-2 errors (e.g. missed code, incorrect data label) per 5,000-6,000 data lines reported per quarter. This level of quality is relatively high, particularly given the detailed level of transactions being reported by OTA and the manual input template used by the State Department. OTA is working to automate data extraction and reporting to the greatest extent possible.</p>
<p><b>Environmental Protection Agency*</b></p>	<p><b>RATIONALE FOR LACK OF PUBLICLY AVAILABLE INFORMATION</b></p> <p>While EPA acknowledges non-compliance with the requirements of Section 4(1)(4)(A), the non-compliance is not without justification.</p> <p>As GAO indicated in their August 2016 report: “FOREIGN ASSISTANCE: Actions Needed to Improve Transparency and Quality of Data on ForeignAssistance.gov,” EPA faces a multitude of significant challenges to complying with the statute. The Agency:</p> <ul style="list-style-type: none"> <li>• Lacks a single agency ITA system from which to pull all foreignassistance.gov information;</li> <li>• Faces limitations in its current IT systems for collecting and reporting FATAA-required information;</li> <li>• Lacks funding, staffing and other resources through which FATAA compliance may be obtained; and,</li> <li>• In the context of the aforementioned factors, is substantially challenged in meeting quarterly reporting requirements mandated under FATAA.<sup>1</sup></li> </ul> <p>Despite these formidable challenges, EPA works to consistently meet all Executive Branch requests for International budget information on time and been responsive to any follow up queries, seeking to meet the spirit of FATAA as best it can. Indeed, since the 2016 Report, resources devoted to this matter have been reduced (in terms of inflation and potential investment costs) in Enacted budgets – and eliminated in FY 2018 and FY 2019 President’s Budgets since the Report, further complicating FATAA compliance for the Agency.</p>

	<p>For example, EPA has been participating and providing annual budget data, for over a decade, on International projects and have worked collaboratively with Department of State and USAID to develop a means of providing EPA's information in a format that can be 'mined' for uploading into foreignassistance.gov. In addition, EPA has been working with the foreignassistance.gov team to address its FATAA compliance challenges through the development of schema that could potentially allow for manual quarterly or annual data submissions while facing [sic].</p> <p>To that end, we would seek to highlight that EPA believes that there needs to be a clearer acknowledgement / category that recognizes current direction and resource levels of Executive Agencies in conjunction with FATAA, so that OMB and Congress may be informed of FATAA compliance challenges facing Executive Branch Agencies so as not to discount the investment of time of EPA staff on reporting both international awards annually for foreignaffaris.gov and developing an EPA international and monitoring policy as required by OMB and FATAA.</p> <p><b>PLAN AND TIMELINE FOR FUTURE FATAA COMPLIANCE</b></p> <p>The Agency has identified IT challenges, which include among other things FATAA compliance, and is currently working on developing multi-year information technology- (IT-) based project plans by which to holistically address the GAO-identified issues hindering FATAA compliance, so as to allow the Agency to position itself to potentially become compliant in the future.</p> <p>In the meantime, EPA will work with OMB and the foreignassistance.gov team to develop a schema for EPA reporting. Following the development of a schema, EPA will work with OMB and the Team on a plan for manual quarterly reporting using the schema to move toward closer compliance with FATAA and be well positioned to automate reporting to foreignassistance.gov once IT-related barriers are resolved.</p> <p><b>ATTACHMENTS &amp; FIGURES</b></p>
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Figure 6: Anticipated Impediments to Their Data Collection Process Identified by Agencies Not Yet Reporting Data for ForeignAssistance.gov

Factors	Agencies											
	COM	DHS	DOE*	DOI	DOJ	DOL	DOT	EPA	Ex-Im	FTC	OPIC	USTDA
<b>Collection and Reporting Systems</b>												
a. Lack of a single governmentwide dedicated server that allows your agency to submit data to State.												
b. Lack of a single agency internal IT system from which to pull all ForeignAssistance.gov information.			✓					✓				✓
c. Limitations in your agency's IT systems from which to collect and report data to ForeignAssistance.gov.			✓	✓	✓	✓		✓				✓
d. Requirement of reporting data quarterly to ForeignAssistance.gov.		✓	✓		✓	✓		✓				✓
<b>Required Data Fields</b>												
e. Your agency does not track data elements ForeignAssistance.gov requires (e.g., agreement/compact data; Development Assistance Committee classification; sector codes).		✓		✓	✓							
f. Your agency data has to be adjusted to fulfill data elements ForeignAssistance.gov requires (e.g., activity description).					✓							✓
g. The number of data fields required for ForeignAssistance.gov.		✓	✓		✓					✓		✓
<b>Resources</b>												
h. Lack of knowledgeable staff to collect and report data to ForeignAssistance.gov.				✓								
i. Lack of staff time to collect and report data to ForeignAssistance.gov.			✓	✓	✓							✓
j. Lack of funding to improve data collection and reporting to ForeignAssistance.gov.		✓	✓		✓	✓		✓				✓
k. Lack of technical capacity to report data to ForeignAssistance.gov in extensible markup language (XML) format.		✓				✓						
<b>Guidance</b>												
l. Lack of clear guidance from State on how to collect and report data to ForeignAssistance.gov.	✓											
m. Lack of point of contact at State (i.e., contractor or employee) to collect and report data to ForeignAssistance.gov.	✓			✓								
n. Lack of point of contacts at your agency from whom to collect and report data to ForeignAssistance.gov.	✓	✓										

✓ Agency-identified great impediment

Legend: IT=information technology, COM=Department of Commerce, DHS=Department of Homeland Security, DOE=Department of Energy, DOI=Department of the Interior, DOJ=Department of Justice, DOL=Department of Labor, DOT=Department of Transportation, EPA=Environmental Protection Agency, Ex-Im= Export-Import Bank of the United States, FTC=Federal Trade Commission, OPIC=Overseas Private Investment Corporation, USTDA=U.S. Trade and Development Agency.

Source: GAO analysis of agency responses to survey | GAO-16-768

Note: \*DOE noted that since December 2015, there has been significant progress in terms of guidance provided by State and points of contact at State and within DOE.

<b>Export-Import Bank</b>	No response required.
<b>Federal Trade Commission*</b>	<p><b>Compliance requirements – Engagement Indicators</b></p> <p>We have reviewed the report and do not have any comments or questions. In response to your question as to why the FTC received a “no” score and is listed as “non-responsive” on the engagement indicator, it is due to the fact that we have not yet onboarded to ForeignAssistance.gov and we are not reporting quarterly because of that. Our tentative plan is to onboard sometime this fall.</p>
<b>Inter-American Foundation</b>	Fully compliant: no response required.
<b>Millennium Challenge Corporation</b>	<p><b>Compliance requirements – FATAA Indicators</b></p> <p><u>Descriptions.</u> MCC received a “No” score for the “Descriptions” indicator on the FATAA Indicators Table.</p> <ul style="list-style-type: none"> <li>• MCC includes descriptions for all our activities on our website and in our .xml data files. The .xml data files are published on MCC’s website, in the IATI registry, and also sent to ForeignAssistance.gov.</li> <li>• However, for ForeignAssistance.gov MCC used the activity title as our award description based on a recommendation from the ForeignAssistance.gov team at the Department of State on how other agencies used this field.</li> <li>• MCC’s data team will prioritize working with the ForeignAssistance.gov team to update all MCC descriptions to include more complete information in FY19 Q1.</li> </ul> <p><b>Compliance requirements – Engagement Indicators</b></p> <p><u>Timeliness.</u> MCC received a “Significantly Delayed” for Timeliness.</p> <ul style="list-style-type: none"> <li>• MCC has been sending the ForeignAssistance.gov team .xml files of all MCC data consistently with the exception of mid-2016 to mid-2017, when our data feed was down and State was also unable to process these files due to a rebuild of their system.</li> <li>• MCC worked with the ForeignAssistance.gov team in the spring of 2018 to agree on a limited data export in Excel that allows ForeignAssistance.gov to publish key fields and MCC is now sending the ForeignAssistance.gov team this limited data set in Excel quarterly.</li> <li>• MCC will work with the ForeignAssistance.gov team to figure out when they will be able to use our .xml data.</li> </ul>

	<p><u>Data Quality.</u> MCC received a “Medium” for Data Quality.</p> <ul style="list-style-type: none"> <li>• MCC has had several rounds of discussions with the ForeignAssistance.gov team, but this has been to sort out the mechanism to transmit the data, not because MCC is submitting poor quality data. The quality of MCC’s data is not the issue.</li> <li>• During the last data round that MCC submitted to ForeignAssistance.gov, MCC adjusted one data point after validation. MCC then had to ask the ForeignAssistance.gov team to restructure the entire spreadsheet because they removed one-fourth of our data before they sent it to us to validate.</li> <li>• MCC does not agree with the assessment that our data is of “medium” quality.</li> </ul>
<p><b>Overseas Private Investment Corporation</b></p>	<p><b>Compliance requirements – FATAA Indicators</b></p> <p>OPIC is working with the interagency process, State, and OMB to implement actions required by FATAA beyond the requirements of current legislation, both as a matter of policy but also in reflection of pending legislation.</p> <p>(A) OPIC’s strategic plan is at the overall program level and not articulated at the regional, country or sector level. OPIC’s strategic plan presently on its public website. OPIC’s plan has not been updated throughout FY 2017 and FY 2018 given an ongoing collaborative interagency process, and action in Congress on proposals involving OPIC. Pending legislation, if enacted, will significantly alter the objectives and strategy of a successor entity.</p> <p>(B) OPIC proposes to develop a responsive set of strategic plans and evaluations in the context of new legislation and a successor entity.</p> <p>OPIC is in the process of transforming into the DFC, which will be subject to FATAA. After that process is complete, the DFC intends to implement disbursement elements the law.</p>
<p><b>Peace Corps</b></p>	<p><b>Compliance requirements – FATAA Indicators</b></p> <p><u>Descriptions.</u> The agency will work with the ForeignAssistance.gov (FA.gov) team to provide a description for all lines as described in the Data Dictionary. The agency currently provides Award Descriptions for our PEPFAR and Reimbursable Agreement lines. We had been working with the FA.gov team on the Award Description field to provide the descriptions for the other reporting lines, but efforts to fulfill the requirements remain ongoing due to the nature of the agency’s financial system output. The anticipated timeline for fulfillment of this requirement is by Q3 of FY19.</p>

<b>U.S. Agency for International Development</b>	Fully compliant: no response required.
<b>U.S Trade and Development Agency*</b>	<p><b>Compliance requirements – Engagement Indicators</b></p> <p>The U.S. Trade and Development Agency (USTDA) is submitting this report to the Office of Management and Budget (OMB) as required by Section 4 of the Foreign Assistance and Transparency Accountability Act (FATAA). As noted in the FATAA report (Report) submitted by OMB to Congress on July 31, 2018, USTDA has not been onboarded into the Foreign Assistance dashboard so is not in compliance with the indicators listed on page 8 of the Report.</p> <p>To ensure USTDA is onboarded as soon as possible, I have organized a working group within USTDA that includes personnel from the Agency’s Offices of Monitoring and Evaluation and Global Programs as well as the Executive leadership of the Agency to develop the reports necessary to be onboarded to the FATAA dashboard. The core group has already begun testing the collection and reporting of data in a repeatable format to ensure USTDA can submit quarterly reports to OMB’s foreignassistance.gov team. Further, the working group and I recently met with USAID’s FATAA onboarding team to address outstanding questions. We are now in the final stage necessary to develop a USTDA-centric reporting tool compliant with FATAA that will allow for quarterly reporting.</p> <p>USTDA looks forward to working closely with the team at OMB to expeditiously finish this process to ensure the public can accurately and fully understand how USTDA is programming taxpayer funds in a manner that opens markets for increased exports of U.S.-manufactured goods and services into emerging economies.</p>

\* Indicates agencies that are not onboarded to ForeignAssistance.gov.