



Implementation of the IT Modernization Centers of Excellence Improvements



This report was revised and reissued on July 27, 2022, to correct and clarify some narrative information. These revisions had no material impact on the report's findings, conclusions, recommendations, or post audit actions.

Implementation of the IT Modernization Centers of Excellence Improvements

Inspection Report 50801-0001-12

OIG reviewed USDA's CoE initiative to determine if its functional areas were effective and sustainable and whether USDA complied with applicable laws and regulations.

OBJECTIVE

The objectives of our inspection were to: (1) determine the implementation status, effectiveness, and sustainability of USDA's CoE initiative; and (2) evaluate its compliance with applicable laws and regulations.

REVIEWED

OIG reviewed laws, regulations, and guidance related to CoE requirements; reviewed applicable contract documents; and interviewed key personnel.

RECOMMENDS

We recommend that OCIO seek an Office of the General Counsel opinion to determine if any Antideficiency Act violations occurred, and, if violations did occur, take appropriate legal and administrative action. Additionally, we recommend that OCIO develop an effective mechanism to ensure IT investments are approved properly.

WHAT OIG FOUND

The 2018 President's Management Agenda established the Centers of Excellence (CoE) initiative to accelerate Information Technology (IT) modernization across Government, improve the public experience, and increase operational efficiency. To accomplish these objectives, the General Services Administration coordinated CoE efforts to centralize top talent, leverage private-sector best practices, and collaborate across the Government. CoE teams operating at the Department of Agriculture (USDA) focused on five functional areas: IT Infrastructure Optimization, Cloud Adoption, Customer Experience, Data Analytics, and Contact Center.

Our inspection determined that all of the CoE functional areas were effectively implemented and are either sustained or completed. However, we also found that the Office of the Chief Information Officer (OCIO) did not obtain concurrence or approval from the Executive Information Technology Investment Review Board (E-Board) before investing in the CoE initiative, as required. This occurred because USDA's internal approval mechanism was not effectively followed prior to funding the CoE initiative, which OCIO stated was due to short timeframes. This oversight may have resulted in a violation of the Antideficiency Act, as relevant law requires USDA to obtain E-Board concurrence prior to expending funds for certain IT-related purposes. Additionally, without the approval of the E-Board, OCIO may not have chosen investments that best support USDA's mission and enterprise architecture.

In addition, we found that OCIO potentially used over \$22.5 million for consulting services that had been mandated for the acquisition of capital investments—such as hardware and software with a useful life of 2 or more years, and an acquisition cost of \$25,000 or greater, except for internal use software, which must have a cost of \$100,000 or greater. According to OCIO, this occurred because OCIO did not determine which contract costs could be capitalized prior to funding. This oversight also might have resulted in a violation of the Antideficiency Act.

OCIO stated that it generally concurs and is working on corrective actions to address the inspection recommendations.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: July 27, 2022

INSPECTION

NUMBER: 50801-0001-12

TO: Gary S. Washington
Chief Information Officer
Office of the Chief Information Officer Name

ATTN: Megen Davis
Director, Strategic Planning, Policy, Egovernment and Audit

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: Implementation of the IT Modernization Centers of Excellence Improvements

As part of an internal quality control process, we identified errors in the subject report that we issued on September 23, 2020. Consequently, we revised the report to address these errors. Ultimately, these revisions resulted in no material impact on the reported findings, conclusions, and recommendations.

We accepted management decision on January 6, 2021, for all three recommendations. Subsequent to this, on June 28, 2022, Office of the Chief Financial Officer stated that final action has been achieved. We regret any inconvenience these revisions may have caused OCIO, and we appreciate the agency's continuous assistance.

Again, we appreciate the continued courtesies and cooperation extended to us by members of your staff. This updated report contains publicly available information and will be posted in its entirety to our website (<https://usdaoig.oversight.gov/>) in the near future.

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Background and Objectives

Background

The President’s Management Agenda, published in March 2018, established the Centers of Excellence (CoE) initiative, led by the General Services Administration (GSA).¹ The CoE initiative was established to accelerate information technology (IT) modernization across Government, improve the public experience, and increase operational efficiency. To accomplish these objectives, the CoE initiative sought to centralize top Government technical talent, leverage private-sector best practices, and operate with a team-oriented mindset to collaborate across Government departments and agencies. The CoE teams operating at the Department of Agriculture (USDA) focused on five functional areas: IT Infrastructure Optimization, Cloud Adoption, Customer Experience, Data Analytics, and Contact Center. Starting with USDA, CoE worked to accelerate IT modernization by improving design and customer interactions with key agencies and programs.

CoE created specialized teams with a three-phased approach. Phase 0 consisted of engagement scoping, interagency agreement development, and funding identification. Phase I involved a comprehensive Department-wide discovery and planning effort to identify initial and high-impact modernization projects. In addition, Phase I included reaching agreement on recommendations to modernize IT projects. Lastly, Phase II was the implementation of the agreed-upon Phase I recommendations, which combined two functional areas and added two new functional areas, explained below. Phase II also included plans to sustain and continue modernization efforts beyond CoE Phase II.

As a result of Phase I, the first area of focus combined IT Infrastructure Optimization and Cloud Adoption, which was created to reduce the number of data centers and to accelerate USDA-wide adoption of the Cloud Smart Strategy.² The Cloud Smart Strategy was designed to reduce operating costs and improve both security and performance of the Government applications. The second focus area, Customer Experience, was developed to enable USDA mission areas to analyze, understand, design, and produce outstanding customer experiences. It was also developed to produce an ecosystem for sustaining an exceptional customer experience. Data Analytics, the third focus area, was organized to deliver data analytics tools that improve USDA decision-making as a “facts-based, data-driven, and customer-focused organization.”³ The fourth focus area, the Contact Center, developed and implemented omni-channel⁴ One USDA Contact Center and implemented a centralized knowledge management solution⁵ to address the

¹ President’s Management Agenda, link removed (Mar. 20, 2018).

² According to Office of Management and Budget (OMB) M-19-19, the Cloud Smart strategy emphasizes the use of risk-based decision-making and service delivery as key considerations in evaluating cloud technologies.

³ USDA Strategic Plan FY 2018–2022. USDA’s Mission Statement is to “provide leadership on agriculture, food, natural resources, rural infrastructure, nutrition, and related issues through fact-based, data-driven, and customer-focused decisions.”

⁴ An omni-channel utilizes multiple channels to increase efficiency by servicing different customer segments and allowing for flexible routing strategies.

⁵ A centralized knowledge management solution supplies consistent information to all digital, voice, and social media channels.

diverse needs of USDA customers. Additionally, two new focus areas were created as a result of Phase I: the Voice of the Customer and the Business Modernization Office. The Voice of the Customer was developed to implement a tool that had the potential to capture external and internal customer insights. The Business Modernization Office was created to drive governance, strategic alignment, and program performance for the CoE initiative.

Before investing in a major IT modernization effort, agencies must receive concurrence and approval from the USDA Executive Information Technology Investment Review Board (E-Board), which is composed of the Department's senior leaders and provides the Secretary with recommendations for approval. The responsibilities of the E-Board are to ensure that proposed investments contribute to the Secretary's strategic vision and mission requirements, employ sound IT investment methodologies, comply with Departmental enterprise architecture, employ sound security measures, and provide the highest return on the investment or acceptable project risk.

Objectives

The objectives of our inspection were to: (1) determine the implementation status, effectiveness, and sustainability of USDA's CoE initiative; and (2) evaluate its compliance with applicable laws and regulations.

Section 1: Implementation Status, Effectiveness, and Sustainability

What Were the Implementation Status, Effectiveness, and Sustainability Results of the CoE Initiative?

Our inspection determined that all of the CoE functional areas were effectively implemented and are either sustained within USDA or completed. To determine the implementation status and sustainability, we compared the deliverables from the statements of work to the CoE transition reports, which outline the accomplishments of the CoE and their next steps. We then selected deliverables and verified whether they were met to determine the initiative's effectiveness. To support the work for all of the functional areas, each CoE was staffed with both GSA and USDA employees, as well as contracted industry partners. The Office of the Chief Information Officer (OCIO) fully embraced the CoE concept and was able to effectively integrate teams to form a notable interagency effort that successfully delivered progress toward USDA's goals for the CoE initiative.

Below are several highlighted accomplishments, spanning each of the CoE initiative's functional areas:

- IT Infrastructure Optimization and Cloud Adoption, which were combined into one functional area, closed 10 data centers, with plans to close 2 more in fiscal year (FY) 2020. It also moved over 900 applications to the cloud, or approximately 81 percent of USDA's cloud-capable applications. This functional area is sustained.
- Customer Experience improved the user-friendliness of websites, such as farmers.gov, where a new tool was created to reduce the time and stress it takes for farmers to apply for a direct farm loan. This functional area is completed.
- Data Analytics created over 200 dashboards to make data more accessible and suitable for straightforward application to decision-making. This initiative is sustained.
- Contact Center consolidated 11 contact centers from several different agencies into a single center. This functional area is sustained.
- Voice of the Customer piloted a platform that improved access to customer-focused data, such as Tell Sonny, which gave USDA customers an outlet to ask questions and provide feedback. This functional area is completed and the pilot program was not renewed.
- Business Modernization Office provided governance over the CoE initiative and is sustained.

Section 2: Compliance With Applicable Laws and Regulations

Did the Department Comply With Applicable Laws and Regulations?

The Department did not comply with applicable laws and regulations regarding the funding of the CoE initiative. We found that OCIO did not obtain E-Board concurrence or approval, required by law⁶ and internal USDA policy,⁷ prior to implementing Phases I and II of CoE, which cost over \$31.6 million. OCIO also may have violated certain appropriation restrictions requiring that USDA's Working Capital Fund (WCF) be used only for capital investments.⁸

Finding 1: OCIO Did Not Obtain E-Board Concurrence or Approval for CoE

We found that during Phase 0, OCIO did not obtain concurrence or approval from the E-Board before investing in the CoE initiative, as required by the Consolidated Appropriations Act of 2018⁹ and the *USDA IT Capital Planning and Investment Control (CPIC) Guide*.¹⁰ This occurred because USDA's internal approval mechanism was not effectively followed prior to funding the CoE initiative, which OCIO stated was due to short timeframes. This oversight may have resulted in a violation of the Antideficiency Act,¹¹ as relevant law required USDA to obtain E-Board concurrence prior to expending funds for certain IT-related purposes.¹² Additionally, without the approval of the E-Board, OCIO may not have chosen investments that best support USDA's mission and enterprise architecture.

The Consolidated Appropriations Act of 2018 states that none of the funds made available by the Act may be used to acquire new information technology systems or significant upgrades, as determined by the OCIO, without the approval of the Chief Information Officer and the concurrence of the E-Board.¹³ The *USDA IT CPIC Guide* requires that all IT investments be reviewed and approved by the E-Board before the investments obtain funding.¹⁴ The guide also requires all IT acquisitions, contracts, and agreements over \$25,000 to go through the Acquisition Approval Request (AAR) process for funding. The AAR process is the mechanism through which USDA OCIO monitors and reviews IT spending and includes E-Board approval confirmation.

We found that OCIO did not obtain the required concurrence or approval from the E-Board before investing in the CoE initiative, which cost over \$31.6 million. E-Board review is essential because the E-Board, which is composed of the Department's senior leaders, provides the

⁶ Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, § 706, 132 Stat. 348, 382 (2018).

⁷ USDA, *USDA IT CPIC Guide*, §§ 2.1.1, 3.2.2 (2019).

⁸ Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, §§ 702, 727, 132 Stat. 348, 381-82, 388 (2018).

⁹ Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, § 706, 132 Stat. 348, 382 (2018).

¹⁰ USDA, *USDA IT CPIC Guide*, §§ 2.1.1, 3.2.2 (2019).

¹¹ The Antideficiency Act prohibits Federal entities from making expenditures or obligations in excess of the amounts available in an appropriation. Appropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law.

¹² Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, § 706, 132 Stat. 348, 382 (2018).

¹³ *Ibid.*

¹⁴ USDA, *USDA IT CPIC Guide*, §§ 2.1.1, 3.2.2 (2019).

Secretary with recommendations for approval. The responsibilities of the E-Board are to ensure that proposed investments contribute to the Secretary's strategic vision and mission requirements, employ sound IT investment methodologies and sound security measures, comply with Departmental enterprise architecture, and provide the highest return on the investment or acceptable project risk.¹⁵

When we interviewed OCIO and requested evidence of E-Board concurrence or approval, OCIO stated that it was working to obtain retroactive approval of AARs, which would include retroactive E-Board approval. According to relevant USDA policy, E-Board review is a required part of the AAR process.¹⁶ During our inspection closeout meeting, OCIO management reversed its position and stated that E-Board concurrence and approval occurred based on briefings provided to senior management during other high-level meetings. However, these briefings did not meet the intent or requirements of an E-Board concurrence or approval. OCIO was unable to provide sufficient evidence of that concurrence and approval, according to the *E-Board Charter* of proceedings or USDA DR 3130-010.

The *E-Board Charter* requires at least quarterly meetings and a quorum for all E-Board meetings and decisions that consists of 50 percent of the voting members and the chair.¹⁷ According to DR 3130-010, the E-Board shall evaluate, assess, and recommend submitted major IT investments to ensure they are managed as strategic business resources and to ensure that proposed major IT investments contribute to the Secretary's strategic vision and business requirements.¹⁸ The CoE initiative would be considered a major IT investment due to its high executive visibility¹⁹ and total lifecycle Development, Modernization, and Enhancement²⁰ investment costs that are greater than \$20 million.²¹ The directive also states that the E-Board Chair shall convene an E-Board meeting with an approved agenda and facilitate the E-Board governance review and assessment process that culminates in an E-Board Governance Assessment Scorecard and provides governance recommendations to the Secretary.

OCIO was unable to provide documentation that the above process was used/completed, and without E-Board concurrence, investment in the CoE initiative could result in a violation of the Antideficiency Act.²² Without E-Board concurrence prior to the CoE acquisitions, OCIO may have violated the restrictions on funding in Section 706 of the Consolidated Appropriations Act of 2018.²³ The Antideficiency Act prohibits Federal entities from making expenditures or obligations in excess of the amounts available in an appropriation; therefore, an appropriation must be available for an agency to incur an obligation or the Antideficiency Act will be violated.

¹⁵ USDA Departmental Regulation (DR) 3130-010, USDA Enterprise IT Governance (Dec. 3, 2015).

¹⁶ USDA, *USDA IT CPIC Guide*, §§ 2.1.1, 3.2.2 (2019).

¹⁷ USDA, *E-Board Charter*, VI (2015).

¹⁸ USDA DR 3130-010, USDA Enterprise IT Governance (Dec. 3, 2015).

¹⁹ OMB, *Management and Oversight of Federal Information Technology*, Memorandum M-15-14 (June 10, 2015).

²⁰ Projects and activities leading to new IT assets/systems, as well as projects and activities that change or modify existing IT assets to improve capability or performance.

²¹ USDA DR 3130-010, USDA Enterprise IT Governance (Dec. 3, 2015).

²² 31 U.S.C. § 1341.

²³ Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, § 706, 132 Stat. 348, 382 (2018).

FY 2018 funds were not available for expenditures on “new IT Systems or significant upgrades” until such expenditures received the concurrence of the E-Board.²⁴

Recommendation 1

OCIO should seek an Office of the General Counsel (OGC) opinion to determine if an Antideficiency Act violation occurred due to the lack of E-Board concurrence for the CoE initiative, and, if a violation did occur, take appropriate legal and administrative action.

Agency Response

In its response, dated September 15, 2020, OCIO stated that it generally concurs with the recommendation and has contacted OGC regarding the findings.

OIG Position

While the Office of Inspector General (OIG) agrees with OCIO’s approach for this recommendation, we cannot accept the response for management decision. To reach management decision, OCIO needs to provide a description of the corrective actions that address this recommendation, including timeframes for implementing the recommendation.

Recommendation 2

OCIO needs to develop an effective mechanism to ensure the AAR process is followed.

Agency Response

In its response, dated September 15, 2020, OCIO stated that it generally concurs with the recommendation and will develop and deploy an automated tool to ensure that IT acquisition activities adhere to and follow the AAR process.

OIG Position

While OIG agrees with OCIO’s approach for this recommendation, we cannot accept the response for management decision. To reach management decision, OCIO needs to provide a description of the corrective actions that address this recommendation, including timeframes for implementing the recommendation.

²⁴ *Ibid.*

Finding 2: OCIO Potentially Used Working Capital Funds Inappropriately

We found that OCIO potentially used over \$22.5 million for consulting services that had been mandated for the acquisition of capital investments, such as hardware and software. According to OCIO, this occurred because OCIO did not determine which contract costs could be capitalized prior to funding.²⁵ This oversight may have resulted in a violation of the Antideficiency Act.

The Consolidated Appropriations Act of 2018 requires that unobligated discretionary balances and credit card rebates transferred into USDA's WCF only be used for the acquisition of plant and capital equipment.²⁶ According to USDA guidance and the Statement of Federal Financial Accounting Standards (SFFAS), property, plant, and equipment²⁷ must have a useful life²⁸ of 2 or more years²⁹ and must also have a cost of \$25,000 or greater, except for internal use software, which must have a cost of \$100,000 or greater.^{30, 31} We determined that some costs associated with Phase II did not meet capital investment criteria. For example, the Voice of the Customer functional area was developed to implement a tool that could potentially capture external and internal customer insights, but it was not renewed after the trial period of Phase II and would therefore not be considered a capital investment.

We found that OCIO potentially used over \$22.5 million, of the over \$31.6 million expended for the CoE initiative, for consulting services that had been mandated for the acquisition of capital investments. OCIO's CoE initiative was primarily funded from USDA's WCF. On August 31, 2018, USDA notified Congress of the transfer of unobligated discretionary funds and credit card rebates to the WCF. USDA also notified Congress of its intent to use the transferred funds for capital investments in CoE IT modernization activities. USDA was required to notify Congress at least 30 days in advance of using the funds.³² That 30-day period ended on September 30, 2018; however, on September 28, 2018, the Office of the Chief Financial Officer made over \$22.5 million from the WCF available for the CoE initiative. OCIO then signed the CoE interagency agreements between OCIO and GSA on September 28 and 29, 2018.

During the course of our inspection, OCIO retroactively assessed whether the funds used for the CoE initiative were appropriately categorized as capital investments for FY 2018. OCIO determined that 26 percent of the costs could be capitalized and 74 percent could not. Additionally, a GSA official informed us that the contracts used for CoE purposes were for

²⁵ According to DR 2200-002, capitalized costs are all property meeting the following criteria: (1) be of a durable nature, (2) have a useful life of 2 or more years once it is placed into service, and (3) its initial acquisition cost must be \$25,000 or more, except for internal use software, where the initial acquisition cost must be \$100,000 or more.

²⁶ Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, §§ 702, 727, 132 Stat. 348, 381-82, 388 (2018).

²⁷ General property, plant, and equipment, such as software and hardware, is any plant, property, and equipment used in providing goods or services.

²⁸ The normal operating life in terms of utility to the owner.

²⁹ USDA DR 2200-002, Property, Plant, and Equipment (Apr. 2, 2013), SFFAS 6, Accounting for Property, Plant, and Equipment (Nov. 30, 1995), and SFFAS 10, Accounting for Internal Use Software (Oct. 9, 1998).

³⁰ Internal use software is software that is purchased from commercial vendors off-the-shelf, internally developed, or contractor-developed solely to meet internal or operational needs.

³¹ USDA DR 2200-002, Property, Plant, and Equipment (Apr. 2, 2013).

³² Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, § 717(d), 132 Stat. 348, 386 (2018).

consulting services, not capital investments. We determined that CoE contracts were executed without knowing whether CoE investment costs could be capitalized.

The Antideficiency Act prohibits Federal entities from making expenditures or obligations in excess of the amounts available in an appropriation.³³ If OCIO used funds earmarked for capital investments for consulting services, this may have led to a violation of the Antideficiency Act, as “appropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law.”³⁴ The WCF funds in question (FY 2018 funds transferred to the WCF) were only available for expenditures on “plant or capital equipment” and were not available for other purposes, including services. If OCIO expended such funds for services when those funds were not legally available for that use, then OCIO may have violated the Antideficiency Act.

Recommendation 3

OCIO should seek an OGC opinion to determine if an Antideficiency Act violation occurred regarding the classification of the CoE initiative as capital investments, and, if a violation occurred, take appropriate legal and administrative action.

Agency Response

In its response, dated September 15, 2020, OCIO stated that it generally concurs with the recommendation and has contacted OGC regarding the findings.

OIG Position

While OIG agrees with OCIO’s approach for this recommendation, we cannot accept the response for management decision. To reach management decision, OCIO needs to provide a description of the corrective actions that address this recommendation, including timeframes for implementing the recommendation.

³³ 31 U.S.C. § 1341(a)(1)(A).

³⁴ 31 U.S.C. § 1301(a).

Scope and Methodology

The scope of our inspection covered USDA and GSA's joint effort for the CoE initiative. We conducted our fieldwork in Washington, D.C. The inspection's scope covered FYs 2018 and 2019.

To accomplish our inspection objectives, we:

- interviewed key personnel from USDA and GSA to determine the current status of the initiative and determine if customers were using and plan to use the deliverables in the future;
- reviewed laws, regulations, and guidance related to CoE requirements; and
- identified the source of funds, cost of the CoE initiative, and deliverables received by reviewing the applicable contract documents.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.³⁵ These standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions and recommendations based on our review objectives. We did not assess the IT or cyber security associated with the CoE initiative. We believe that the evidence obtained provides a reasonable basis for our conclusions and recommendations based on our review.

³⁵ CIGIE, *Quality Standards for Inspection and Evaluation* (Jan. 2012).

Abbreviations

| | |
|---------|--|
| AAR | Acquisition Approval Request |
| CoE | Centers of Excellence |
| CPIC | Capital Planning and Investment Control |
| DR | Departmental Regulation |
| E-Board | Executive Information Technology Investment Review Board |
| FY | fiscal year |
| GSA | General Services Administration |
| IT | information technology |
| OCIO | Office of the Chief Information Officer |
| OGC | Office of the General Counsel |
| OIG | Office of Inspector General |
| OMB | Office of Management and Budget |
| SFFAS | Statement of Federal Financial Accounting Standards |
| U.S.C. | United States Code |
| USDA | Department of Agriculture |
| WCF | Working Capital Fund |

Exhibit A: Summary of Monetary Results

Exhibit A summarizes the monetary results for our inspection report by finding and recommendation number.

| Finding | Recommendation | Description | Amount | Category |
|----------------|-----------------------|--|----------------------------|--------------------------------------|
| 1 | 1 | Funding expended without the required E-Board concurrence or approval. | \$31,697,363 | Questioned Costs, No Recovery |
| 2 | 3 | Potential amount inappropriately used as capital funds. | \$22,581,550 ³⁶ | Questioned Costs, No Recovery |
| Total | | | \$ 31,697,363 | |

³⁶ This amount from Recommendation 3, over \$22.5 million, is a subset of the amount from Recommendation 1, over \$31.6 million.

**OCIO's
Response to Inspection Report**



United States Department of Agriculture

Office of the
Secretary

Office of the Chief
Information Officer

1400 Independence
Avenue S.W.

Washington, DC
20250

TO: Gil H. Harden
Assistant Inspector General for Audit
Office of the Inspector General

FROM: Gary S. Washington /s/
Chief Information Officer
Office of the Chief Information Officer

SUBJECT: Office of Inspector General Inspection IT Modernization Centers of Excellence
Improvements (50408-0001-12)

Thank you for the opportunity to review the draft IT Modernization Centers of Excellence Improvements report. The U.S. Department of Agriculture (USDA) generally concurs with findings and recommendations in the report. We have no additional comments on the material presented.

The USDA actions associated with the findings and recommendations in the report are as follows:

Action 1 - USDA has reached out to the Office of the General Council (OGC) regarding the findings.

Action 2 – the Office of the Chief Information Officer (OCIO) will develop and deploy an automated tool to ensure that IT acquisition activities adhere to and follow the Acquisition Approval Request (AAR) process.

We look forward to receiving the final OIG report. If additional information is needed, please contact Megen Davis, OCIO Audit Liaison, at (202) 631-1266.

cc: Bajinder Paul, Deputy CIO
Scott Soles, Principal Deputy CFO
Lynn Moaney, Deputy CFO
Megen Davis, Audit Liaison, OCIO
Mohammad Nikraves, Audit Liaison
Maria Vlioras, Executive Assistant, CIO
Telora Dean, Executive Director, BMO
Ray Payton, Associate CIO, IRMC
Flip Anderson, Director, FITARA Operations, Action Deputy, BMO
Tonya Judkins, OCIO Chief of Staff
Chris Wren, Director, Business Management Office

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