



September 26, 2014

David A. Lebryk
Fiscal Assistant Secretary
U.S. Department of the Treasury
401 14th Street, Room 548
Washington, DC 20220

Dear Dave:

Thank you for the opportunity to submit written comments for the September 26, 2014 Data Transparency Town Hall. In particular, we want to respond to the question posed by the U.S. Department of the Treasury (Treasury) about why federal spending transparency is important. We also want to provide thoughts on ways in which the federal government can promote government transparency by establishing and sustaining a process for consulting with those of us who receive federal funds, either directly or indirectly.

Government exists to provide services that the people either cannot or choose not to provide for themselves. The government then has the responsibility to report to citizens about the funds it received and spent. Federal spending transparency is important so that government officials will have the information they need to make decisions and to communicate with the public about where their money is going. As we look toward the adoption of standards, we must also consider existing financial data reporting requirements. It will be essential to assess the financial and operational impacts of new standards on the recipients and subrecipients of federal funds. Furthermore, it is

important to assure such standards take into account pre-existing system capacities, project timelines and project deliverables.

As standardization becomes the norm and performance measures are improved, government officials should also be able to tell the public what they are getting for their money.

If adopted by all those who receive federal dollars either directly or as subrecipients, the standardization called for in the DATA Act will lay a firm foundation for better information about federal spending. Information reported by non-federal entities would be consistent, machine readable and searchable, thereby meeting governments' responsibility to communicate how funds are being spent. Standardization would also help analyze spending across states, local governments, universities and non-profits and make it possible for the private sector to produce data delivery and analysis services.

In addition, we would like to build on agreements that were reached during a September 4, 2014 meeting at the White House Conference Center, which Treasury, OMB and other federal officials conducted with associations representing recipients and subrecipients. During the meeting, it was agreed that successful implementation of the DATA Act and federal spending transparency will necessitate collaboration, not just outreach, with non-federal stakeholders. Treasury has already developed an excellent foundation for stakeholder input with yesterday's Federal Financial Transparency Workshop. While the workshop was very well done, we encourage Treasury to maintain an additional, ongoing line of communication with those who receive federal dollars either directly or as subrecipients. Our suggestions are:

Options for Ongoing and Sustainable Collaboration

- Include non-federal stakeholders who receive federal funds in calls and meetings of the appropriate Interagency Council and the five work streams.
- Conduct regular recurring calls with recipients and subrecipients to gain input, test ideas and obtain feedback before decisions are made.
- Explore the possibility of using social media and other tools to obtain thoughts on implementation issues. There are a number of questions about how this would work, but we would welcome the opportunity to work with you in exploring options.

- Work with members of the recipient and subrecipient community in hosting workshops or summits on federal spending transparency or DATA Act implementation. These events could foster education and information exchange and enhance problem solving. One excellent example is yesterday's Federal Financial Transparency Workshop. Alternatively, one or more of our associations might host a summit or workshop similar to AGA's recent *Circular A-123 Forum* that brought industry and government together to discuss internal controls and risk management.
- Develop an inclusive, transparent approach to developing and implementing the DATA Act pilot program. Given the emphasis that Congress placed on the pilot, it would be helpful to have broad base of support to explain the pilot results and their implications for public policy.

Thank you again for the opportunity to provide comments in conjunction with the town hall. Please do not hesitate to contact either of us should you have any questions.

Sincerely,



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