

For: FSA National Office Employees

Data Verification and Validation Procedures for All Government Performance and Results Act (GPRA) and Program Assessment Rating Tool (PART) Program Performance Reporting

Approved by: Administrator



1 Overview

A Background

FSA must provide quality program performance data to the Department and the Office of Management and Budget (OMB) for use in reports and budget documents submitted to Cabinet heads, Departmental offices, OMB, and Congress on their progress in achieving strategic and annual goals and objectives.

- GPRA, OMB through Circular A-11, "Preparation, Submission and Execution of the Budget," as well as the-PART, the President's Management Agenda (PMA), budget and performance integration (BPI), and financial management initiatives require that Federal agencies provide sound performance data to demonstrate program performance and effectiveness.
- The Federal Managers' Financial Integrity Act (FMFIA) requires establishing and maintaining a system of internal controls to provide complete disclosure of Agency activities and finances.

Agencies must have sound, reliable data about agency program performance and effectiveness to make informed managerial and policy decisions. The data are required for performance and accountability reports, budget submissions, PART updates, and other documents. Therefore, to more fully comply with the law and Federal regulations, FSA is requiring all offices that collect data for program performance information to create and maintain quality control protocols to verify and validate all program performance information used in reporting.

Disposal Date	Distribution
November 1, 2008	FSA National Office employees

Notice AO-1401

1 Overview (Continued)

B Purpose

This notice informs all offices that they:

- must conform to data verification and validation protocols when providing program performance data used in reporting, according to subparagraph 2 B
- must ensure that all program performance information provided for reporting purposes is valid, verifiable, and replicable
- must be able to provide documentation of data source and methodology for all program performance data
- must use a methodology to calculate data for program and/or Agency performance measures that is explicit and replicable
- must maintain documentation of program performance data in office files in case of audit by the Office of Inspector General (OIG) or other parties as random and periodic internal audits or reviews of data may occur to verify program performance data
- should conduct a self-assessment of their program performance data systems on a regular, and preferably quarterly, basis
- should use the Data Verification and Validation Checklist (Exhibit 1) as a guide when designing program performance data assessment processes.

2 Data Verification and Validation Checklist

A Purpose

Offices must have a system of verification and validation for all program performance data used in FSA and USDA reports. If OIG, the General Accountability Office (GAO), or other external or internal parties conduct an audit, the Agency must show documentation of the data source and methodology used to create program performance measure data. Any data assumptions and/or limitations must be explicit, and access controls and validation procedures must be in place. The Data Verification and Validation Checklist (Exhibit 1) was developed as a guide for officers responsible for collecting and reporting program performance information.

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2 Data Verification and Validation Checklist (Continued)

B Data Protocols

A protocol for verification and validation must include:

- a description of the data source
- the methodology used for program and/or Agency performance measures
- limitations of, and any assumptions about, the data
- data access control procedures
- data validation procedures by responsible officials.

The Data Verification and Validation Checklist (Exhibit 1) contains a step-by-step process to ensure that program performance data used for reporting is sufficiently sound, valid, and replicable for use in reporting and policy decisions.

C Action

All offices should ensure that:

- program performance data used for reporting purposes are valid, verifiable, and replicable
- data verification and validation protocols have been established to ensure accurate collection, analysis, reporting, and maintenance of program performance data
- employees responsible for program performance reporting conduct a self-assessment of program performance data systems, using the Data Verification and Validation Checklist (Exhibit 1) as a guide

Note: The office needs to conduct the self-assessment at least yearly, but preferably on a quarterly, basis.

- original documents are maintained according to the appropriate record keeping schedule
- upon request, the original documents or source of data will be made available to the Strategic Performance and Evaluation Staff (SPES).

D Contacts

Submit questions or comments about data verification and validation requirements to SPES by telephone at 202-720-5542 (voicemail is available).

Managers may contact Torrie Mattes, Chief, Reporting, Evaluation, and Management Challenges Branch, by e-mail at Torrie.Mattes@wdc.usda.gov.

Farm Service Agency Performance Data Verification and Validation Checklist

Data Verification and Validation	
Measure: Program(s): Full Name of the Office(s):	
Criteria	Comments
1. Explanation of Measure	Describe measurement processes and calculation methodologies. Ensure that the data measures exactly what the objective describes and that data definitions explain any terms that are not self-explanatory.
2. Data Source	Describe source of data information (original records, certifications, etc.) and/or collection methods that are necessary for reconstruction and evaluation of the effort. Ensure that results are traceable. Explain also any assumptions about data sources.
3. Are measurement processes and calculation methodologies applied consistently?	Develop written procedures on the methodology being used; make sure that the necessary mechanisms are in place for quarterly and annual reporting. Train staff.
4. Is the performance measurement process or calculation methodology updated and reviewed at least annually?	Give the schedule for methodology review and update on an as-needed basis.
5. Are data consistency checks employed (for example, screens for obvious inaccuracies, analysis of strange or anomalous data)?	Source data verification will ensure that the data collected are reliable, and allow for reconstruction and evaluation. Complete, accurate, and reliable data provides confidence in conclusions. Appoint a source data monitor, take steps to prevent premature or accidental destruction of documents, and establish guidelines for records retention. Ensure that significant changes in data include a process for examination, and an explanation for the change or the anomaly.

Farm Service Agency Performance Data Verification and Validation Checklist (Continued)

Data Verification and Validation	
Criteria	Comments
6. Are there any data limitations?	Explain any situations in which the data may fail to support a policy decision, such as an instance in which incomplete proxy data is being used.
7. If so, is there a plan to address limitations?	Explain how data limitations will be resolved about policy decisions. For example, if the data is proxy data, explain when the proxy data will be replaced with more appropriate data.
8. If calculations are involved, are these checked by someone other than the preparer?	For example, ensure that OMB Circular A-123 has been followed. Refer to the risk assessments by functional area for details on internal control objectives and procedures. Establish procedures and guidelines for using estimates and/or default data.
9. Are data entries and/or changes documented with a record trail of users or a history report?	Ensure the appropriateness and accuracy of data, especially after changes to circumstances and definitions.
10. Are appropriate access controls in place (for example, locking cabinets for physical documentation, firewalls and password protections for electronic data)?	Refer to the risk assessments by functional area for details on internal control objectives and procedures.
11. Do responsible officials certify that performance data are reliable and that verification procedures were followed each reporting period?	Develop documentation for certification of approval official. Establish areas of residual risk; that is, areas of potential reporting where there are no adequate management controls to mitigate potential reporting risks.
12. Describe any outstanding OIG or GAO recommendations that may affect this measure.	Refer to yearly management challenges identified by the Office of the Inspector General (OIG) and any pertinent Government Accountability Office (GAO) reports.