

PUBLIC SUBMISSION

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Docket: GSA-GSA-2022-0001
GSA Information Collections -2022

Comment On: GSA-GSA-2022-0001-0034
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Federal Audit Clearinghouse

Document: GSA-GSA-2022-0001-DRAFT-0014
Comment on FR Doc # 2022-27893

Submitter Information

Email: rodis@rsp.wisc.edu
Government Agency Type: State
Government Agency: University of Wisconsin-Madison

General Comment

Please see attached comments for Information Collection 3090-XXXX; Federal Audit Clearinghouse from the University of Wisconsin-Madison.

Attachments

UW-Madison_GSA_Comments_Feb_2023



February 21, 2023

Mary Katharine Koch, Senior Procurement Analyst
Federal Acquisition Service
General Services Administration
Submitted via www.regulations.gov

Subject: Information Collection 3090-XXXX; Federal Audit Clearinghouse
Document ID GSA-GSA-2022-0001-0034

Dear Ms. Koch,

The University of Wisconsin-Madison appreciates the opportunity to comment on proposed changes to the Federal Audit Clearinghouse (FAC). We would specifically like to offer thoughts on “ways to enhance the quality, utility, and clarity of the information to be collected.”

Federal government agencies and non-federal entities need to perform risk assessments of organizations with which they intend to do business. Such risk assessments include reviewing an organization’s single audit, when applicable. To facilitate such a review, the GSA should consider creating an API, so that federal agencies and non-federal entities would be able to routinely and automatically import audit data into their systems. The ability to import audit data would enable agencies and entities to have current data readily available for review. This function would enhance the utility of the information in the Federal Audit Clearinghouse.

To make information about organizations easily retrievable, we recommend that a dedicated hyperlink be created for each entity subject to the single audit. An example of this idea is the [recipient profile](#) in USAspending.gov. This would increase the utility of the information in the Federal Audit Clearinghouse by providing a direct link to audit results for individual organizations.

A final recommendation to increase the utility and clarity of the information in the FAC would be to provide a breakdown of audit findings. We recommend including a few different data points for each audit finding. First, each audit finding should be associated with the Unique Entity Identifier (UEI) of the organization subject to the single audit. Second, each audit finding should, as applicable, be associated with the UEI for the entity under the umbrella of the organization subject to single audit (e.g., an individual university that is part of a university system or an individual agency associated with a state government entity). Third, the funding

source (and, if applicable, the UEI) associated with the audit finding(s) should be identified. Having access to this information would help to reduce the burden associated with subrecipient risk assessment, particularly in determining the necessity of management decisions.

Should you have any questions, please feel free to contact me at kmoreland@rsp.wisc.edu or (608) 262-3822.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Moreland". The signature is fluid and cursive, with the first name "Kim" written in a larger, more prominent script than the last name "Moreland".

Kim Moreland
Assoc. Vice Chancellor for Research Administration, and
Director, Research and Sponsored Programs