Do Not Pay
Agency Implementation Guide
For Treasury's Working System

December 2014

Document History and Version Control

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Section 1: Introduction

1.1 Purpose and Scope

The U.S. Department of the Treasury's (Treasury's) Do Not Pay Working System (Working System) is the legislatively mandated and Office of Management and Budget (OMB) designated source of centralized data and analytic services **to help agencies verify eligibility and to identify and prevent fraud, waste, and abuse associated with improper payments**. The results of the checks against these data sources provide information that an agency should consider in preaward or prepayment assessments to help prevent improper payments.

The benefit of implementing Treasury's Working System to government, agency, program, and taxpayer stakeholders is a higher degree of certainty that a payee is legitimate and eligible before making an award or payment. Full implementation of Treasury's Working System is expected to lead to a reduction in government improper payments, and the conservation of Federal dollars for programs. It will provide preventive verification beyond the information an independent agency has available, while still protecting individual privacy. The Federal government will realize the return on its investment as it continues to improve its payment accuracy rate and reduces dollars spent in recapture audits or "pay and chase" models. It is envisioned that the Treasury Working System is only one component of an agency's end-to-end internal control environment designed to mitigate improper awards and payments.

This *Do Not Pay Agency Implementation Guide (Guide)* will assist you in adoption, integration, and application of Treasury's Working System as a solution to complement your agency's internal controls. This *Guide* describes tasks, activities, and processes for you to execute in order to initiate and maximize use of Treasury's Working System.

This *Guide* will help you to:

- Develop a plan to review your current payment processes, capabilities, controls, and problem areas and to identify any gaps;
- Increase the speed and effectiveness of the adoption of Treasury's Working System by outlining the major processes, roles, and responsibilities required for implementation;
- Demonstrate how Treasury's Working System will become part of your internal control processes; and
- Take the necessary steps to measure your performance for requisite reporting to agency management, OMB, and Congress.

This *Guide* does not address system and configuration requirements necessary to use the Do Not Pay Portal, nor does it include steps to gain access to the Do Not Pay Portal. For system and configuration requirements, please refer to the *Do Not Pay Portal User Guide*. For steps to gain access to the Do Not Pay Portal, refer to the *User Enrollment Guide*.

1.2 Background

Enactment of Improper Payments Information Act (IPIA) of 2002[1]

Federal agencies make more than $2 trillion in payments to individuals and a variety of other entities each year. In Fiscal Year 2013, estimates of improper payments totaled approximately $106 billion. The implementing guidance for IPIA, as amended by subsequent laws (as described below), can be found in Appendix C to OMB Circular A-123. Appendix C describes, among other things, the definition of improper payments and key improper payment requirements for agencies (including risk assessments, estimating and reporting, payment recapture audits, and compliance activities).

Issuance of Executive Order 13520 (November 20, 2009)

Executive Order 13520, *Reducing Improper Payments and Eliminating Waste in Federal Programs,*[2] emphasizes that:

> *When the Federal Government makes payments to individuals and businesses as program beneficiaries, grantees, or contractors, or on behalf of program beneficiaries, it must make every effort to confirm that the right recipient is receiving the right payment for the right reason at the right time.*

Accordingly, the Executive Order directed Federal agencies to identify methods to leverage information sharing to improve eligibility verification and prepayment scrutiny. The importance of reducing payment errors and recovering improperly paid amounts was further reinforced in the Presidential Memorandum (March 2010) entitled *Finding and Recapturing Improper Payments.*[3]

Issuance of Presidential Memorandum (June 18, 2010)

Building on those statements, the Presidential Memorandum entitled, *Enhancing Payment Accuracy Through a "Do Not Pay List,"*[4] emphasizes that:

> *While identifying and recapturing improper payments is important, prevention of payment errors before they occur should be the first priority in protecting taxpayer resources from waste, fraud, and abuse. In those cases where data available to agencies clearly shows that a potential recipient of a Federal payment is ineligible for it, subsequent payment to that recipient is unacceptable. We must ensure that such payments are not made.*

To this end, the memorandum further directed agencies to review current preaward and prepayment procedures to ensure that a thorough review of applicable databases occurs before

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[2] Executive Order 13520 of November 20, 2009 (74 Fed. Reg. 62201; November 25, 2009).

[2] Executive Order 13520 of November 20, 2009 (74 Fed. Reg. 62201; November 25, 2009).

[3] Memorandum of March 10, 2010 (75 Fed. Reg. 12119; March 15, 2010).

[4] Memorandum of June 18, 2010 (75 Fed. Reg. 35953; June 23, 2010).

The timeline in **Figure 1** highlights significant events related to the development of Treasury's Working System.

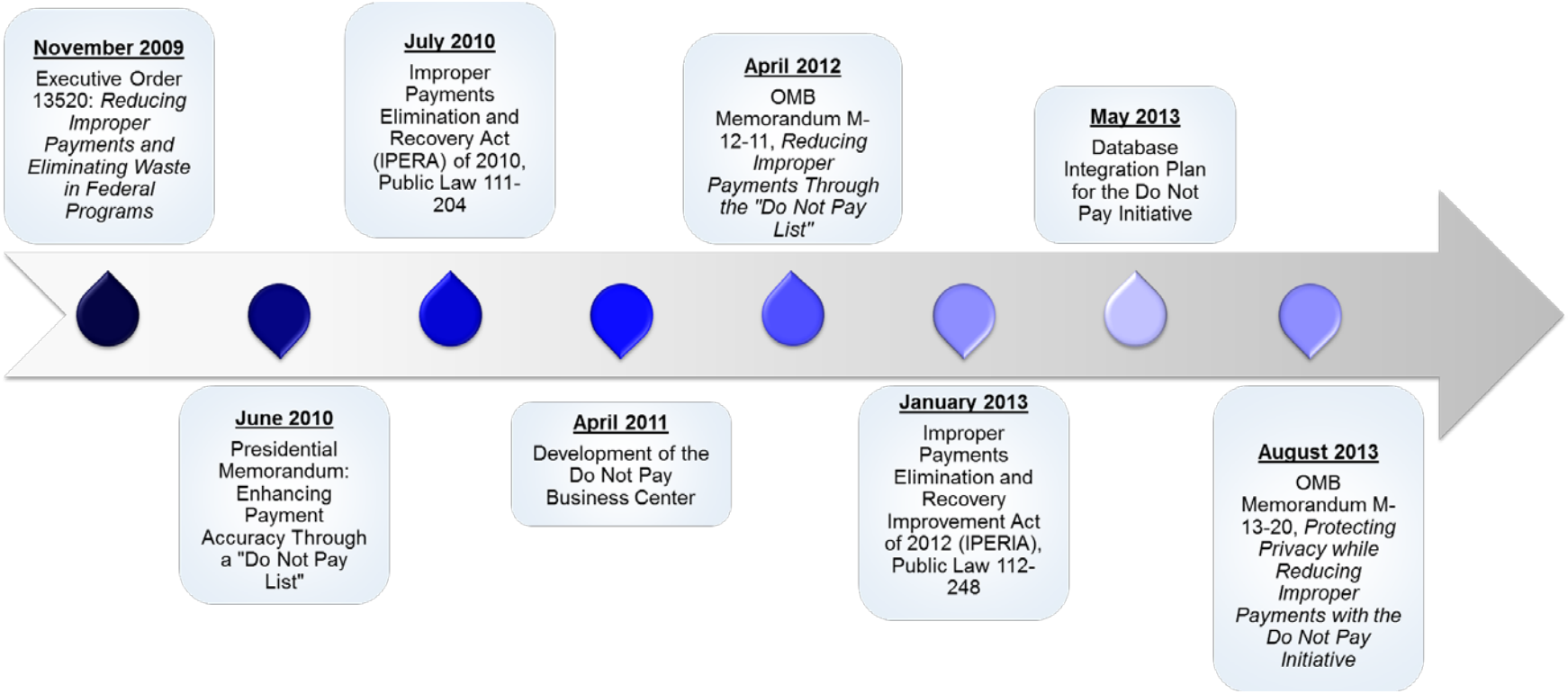


Figure 1: Treasury's Working System Timeline

the release of any Federal funds. The memorandum directed OMB to establish a "single entry point" through which agencies would access relevant data in a network of databases (collectively known as the "Do Not Pay List") before determining eligibility for a benefit, grant, or contract award or other Federal funding.

Enactment of Improper Payments Elimination and Recovery Act (IPERA) of 2010[5] (July 22, 2010)

IPERA amended IPIA and expanded requirements for recovering overpayments across a broad range of Federal programs. IPERA significantly increased agency payment-recapture efforts by expanding the types of payments that agencies should review, and by lowering the threshold of annual outlays that require agencies to conduct payment recapture audits. OMB issued governmentwide guidance on the implementation of IPERA as a revision to Parts I and II of OMB Circular No. A-123 (A-123) Appendix C.[6]

Development of the Do Not Pay Business Center (April 2011)

In Fiscal Year 2011, the Government Accountability Office (GAO) again cited long-standing, widespread, and significant problems with improper payments in the Federal Government.[7] Not all improper payments are fraud or result in a loss to the government. Some improper payments may be due to incomplete documentation. However, all improper payments degrade the integrity and efficiency of government programs and compromise citizen trust in government's stewardship over taxpayer dollars. Therefore, in April 2011, the Treasury's Financial Management Service (FMS) (now known as the Bureau of the Fiscal Service [Fiscal Service]) collaborated with the Saint Louis and Kansas City Federal Reserve Banks as Treasury's Fiscal Agent to develop the Do Not Pay Business Center as part of the Do Not Pay solution.

Issuance of OMB Memorandum M-12-11 (April 12, 2012)

OMB Memorandum M-12-11, *Reducing Improper Payments through the "Do Not Pay List,"* directed executive agencies to take immediate steps to use the centralized solutions that were already in place for prepayment eligibility review. The memorandum required the Chief Financial Officer (CFO) of each agency, or the accountable official for improper payments, and program integrity under Executive Order 13520, to submit to OMB a plan for using the centralized solutions.

Enactment of the Improper Payments Elimination and Recovery Improvement Act (IPERIA) of 2012[8] (January 10, 2013)

IPERIA codified the Do Not Pay Initiative, reinforcing the requirement for agencies to assess preaward and prepayment procedures and to ensure that a thorough review of available databases occurs to determine program or award eligibility and prevent improper payments and improper

[5] Public Law 111-204; July 22, 2010.

[6] Revised December 21, 2004. Effective beginning with Fiscal Year 2006. http://www.whitehouse.gov/omb/circulars_a123_rev.

[7] GAO-11-575T, *Improper Payments: Recent Efforts to Address Improper Payments and Remaining Challenges* (April 15, 2011).

[8] Public Law 112-248; January 10, 2013.

awards. Pursuant to Section 5 of IPERIA, OMB established the Do Not Pay Working System, known as Treasury's Working System, at the Fiscal Service. Treasury's Working System, which includes the Do Not Pay Portal (Portal), exists to provide Federal Government agencies and other entities that administer Federal funds a centrally maintained and managed tool to check against certain data sources. In collaboration with Federal agencies and other recipients of Federal funds, Treasury's Working System includes investigation activities for fraud and systemic improper payments and improper awards detection through analytic technologies and techniques. In addition, IPERIA required OMB to develop a Database Integration Plan for the Do Not Pay Initiative, focusing on the following elements:

- Providing agency access to the Do Not Pay Initiative,
- Improving data use agreements to facilitate data access for the purposes of program integrity, and
- Including other databases in the Do Not Pay Initiative.

Development of Database Integration Plan for the Do Not Pay Initiative (May 2013)

OMB's plan took a phased approach in implementing the databases that agencies will use to check, as appropriate, your awards and payments. The first phase focuses on two publicly available databases, the Social Security Administration's (SSA's) Death Master File (DMF) and the General Services Administration's (GSA's) System for Award Management (SAM) Exclusion Records (referred to in IPERIA as Excluded Party List System) Excluded Parties List System (EPLS).

Issuance of OMB Memorandum M-13-20 (August 16, 2013)

Building on prior guidance, OMB Memorandum M-13-20, *Protecting Privacy while Reducing Improper Payments with the Do Not Pay Initiative*,[9] set forth implementation guidance for the Do Not Pay Initiative to help ensure that the Federal Government's efforts to reduce improper payments and improper awards comply with privacy laws and policies.

1.3 Overview of Treasury's Working System

Goals and Objectives of Treasury's Working System

The overall goal of Treasury's Working System is to help you achieve the goal of mitigating or eliminating improper payments in a cost-effective manner while safeguarding the privacy of individuals. To support this goal, Treasury's Working System offers you access to:

- A variety of tools and resources, including a Web-based portal, providing single-entry access to an array of data sources to assist in determining whether an individual or company is eligible to receive Federal payments or engage in Federal programs or contracts;

[9] M-13-20; August 16, 2013. http://www.whitehouse.gov/sites/default/files/omb/memoranda/2013/m-13-20.pdf

- Assistance establishing Computer Matching Agreements (CMAs) to match to restricted database sources in Treasury's Working System under protection of the Privacy Act of 1974 (Privacy Act);[10] and

- The Analytics Services, which helps you identify trends, patterns, and risks that may be associated with fraud or systemic sources of improper payments and improper awards that may warrant more investigation on the part of the payment-issuing agency.

You must understand that Treasury's Working System does not tell you whether a payment is proper or improper. It will highlight records that may require further research. Treasury's Working System is just one tool to help you mitigate or eliminate improper payments and improper awards by flagging payees who may not be eligible to receive Federal payments or engage in Federal programs or contracts. Leveraging and incorporating Treasury's Working System into your end-to-end internal control and risk management processes and practices will strengthen your entire program. You must still apply your agency's internal policies and procedures to adjudicate findings and ultimately determine whether payees are eligible and payments are proper.

How Treasury's Working System Interacts with Other Treasury Systems

Treasury has engaged a number of key systems to check against the Do Not Pay Portal at the appropriate times. **Figure 2** shows this broader picture of Treasury's Working System in partnership with the International Treasury Services (ITS.gov), the Payments, Claims and Enhanced Reconciliation (PACER), the Invoice Processing Platform (IPP), the Automated Standard Application for Payments (ASAP), and the Payment Application Modernization (PAM) systems.

These other Treasury systems take files from outside agencies and check them against Treasury's Working System (Do Not Pay Portal). These services have already processed agency files. If agencies utilize any of these systems, they are interacting with Treasury's Working System. For instance, Treasury uses PACER to match agency payment files against select Treasury's Working System databases to provide agencies with match results for adjudication. **Section 4: Payment Integration** further describes this matching process. As agencies convert to PAM, Treasury will match agency payments against Treasury's Working System data sources at time of payment. Treasury's Working System collaborates with ASAP and IPP when using the continuous monitoring technique for grant payments and vendor status, respectively. Treasury utilizes ITS.gov for its capability to review international payments and collections. For purposes of this document, "Treasury's Working System" refers to the IPERIA-related activities that may be performed through the Do Not Pay Portal -- although it is important to remember that agencies that interact with these other systems have begun the process as depicted in **Figure 2.**

[10] 5 U.S.C. § 552a, as amended.

Figure 2: Treasury's Working System Overview

1.4 Document Structure

The *Do Not Pay Agency Implementation Guide* has the following sections:

- **Section 1: Introduction** – Discusses purpose and scope of the *Do Not Pay Agency Implementation Guide*; covers the background and recent history of the initiative to reduce improper payments and improper awards, leading to the development of Treasury's Working System; and provides an overview of Treasury's Working System.

- **Section 2: Quick Start Guides** – Includes basic essential information for getting started with Treasury's Working System and Payment Integration.

- **Section 3: Agency Implementation Processes** – Provides an overview of the major processes needed to fully implement Treasury's Working System. Includes sections to discuss each process area in detail. Process areas include the following:

    - Planning,
    - Onboarding,
    - Date Source Determination,
    - Adjudication,
    - Customization, and
    - Reporting.

- **Section 4: Payment Integration** – Discusses the process that Treasury is using to ensure that payments issued by Treasury match against Treasury's Working System.

- **Section 5: Computer Matching Agreements** (CMAs) – More fully discusses the requirement to establish CMAs to access database sources under protection of the Privacy Act.

- **Section 6: Analytic Services** – Discusses the current capabilities and future vision for Treasury's data analytic capabilities as a means to further enhance agency use of Treasury's Working System.

- **Appendices** – Supplemental and supporting materials:

    - **Appendix A: Glossary of Terms** – Provides a list of terms and definitions used throughout the *Guide*,

    - **Appendix B: List of Acronyms** – Provides a list of acronyms and definitions used throughout the *Guide*,

    - **Appendix C: Frequently Asked Questions** – Provides a list of frequently asked questions regarding Treasury's Working System,

    - **Appendix D: Key Stakeholder Roles and Responsibilities** – Defines key stakeholder roles and responsibilities involved in the implementation of Treasury's Working System,

    - **Appendix E: Key Related Legislation, Regulations, and Guidance** – Provides a list of key promulgations related to Treasury's Working System,

    - **Appendix F: Templates and Forms** – Provides a list of templates and forms used during the implementation of Treasury's Working System,

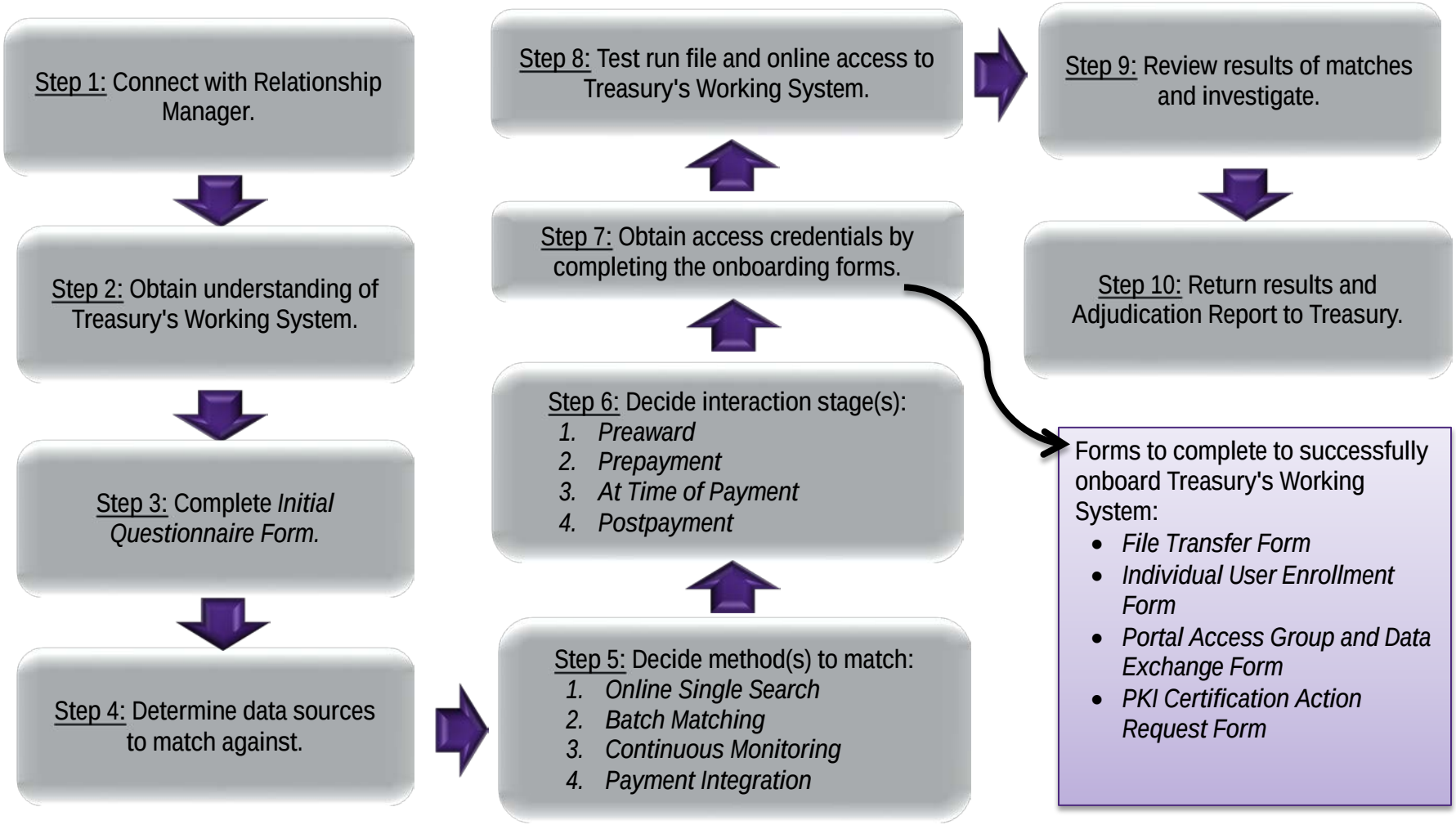
    - **Appendix G: Treasury's Working System Database Sources** – Provides the current list of IPERIA-mandated databases, and

    - **Appendix H: Release 3.0 Functionality** – Provides release notes on version 3.0 of Treasury's Working System.

Section 2: Quick Start Guides

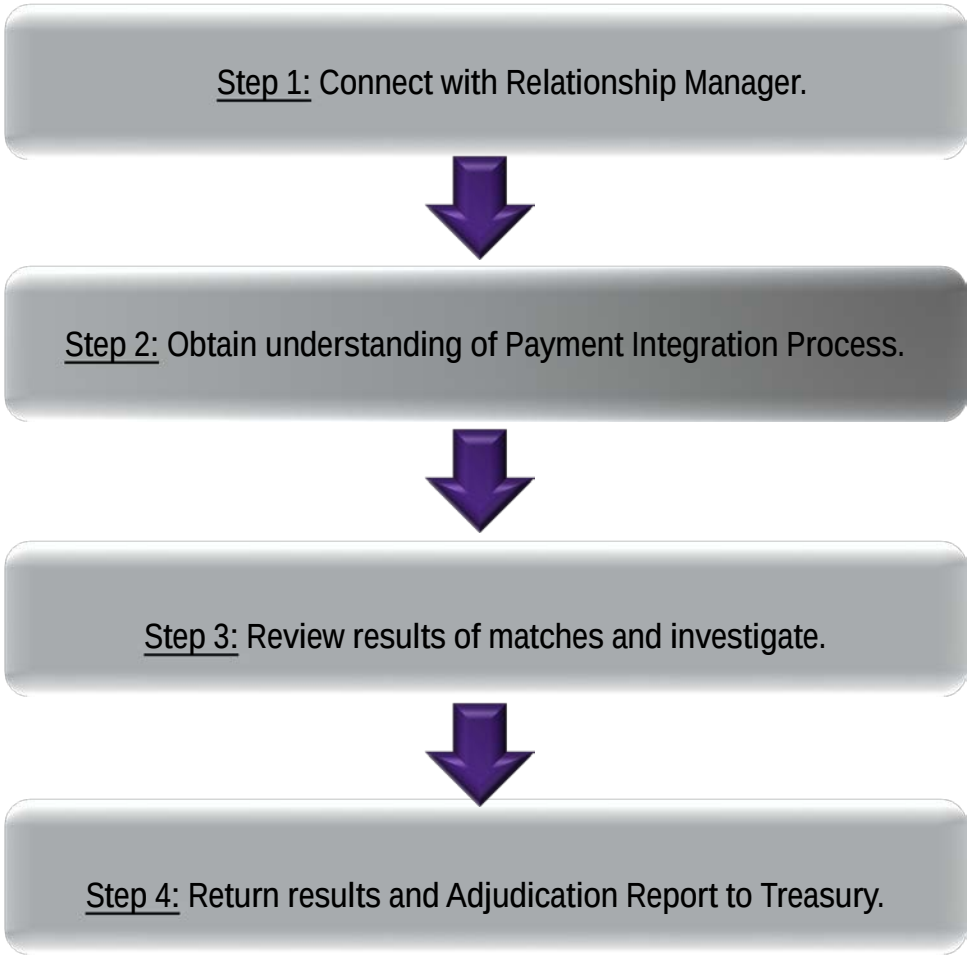
2.1 Treasury's Working System

This *Quick Start Guide* is an interactive worksheet for you to quickly access Treasury's Working System. References to the *Agency Implementation Guide* appear, where possible, for additional information.



2.2 Payment Integration

This *Quick Start Guide* is an interactive worksheet for you to quickly engage through Payment Integration. References to the *Agency Implementation Guide* appear, where possible, for additional information.



Section 3: Agency Implementation Processes

3.1 Overview of Implementation Processes

To fully implement your agency in Treasury's Working System, you must engage in six major process areas. Depicted in **Figure 3**, the six process areas to implement Treasury's Working System include the following:

- Planning,
- Onboarding,
- Data Source Determination,
- Adjudication,
- Customization, and
- Reporting.

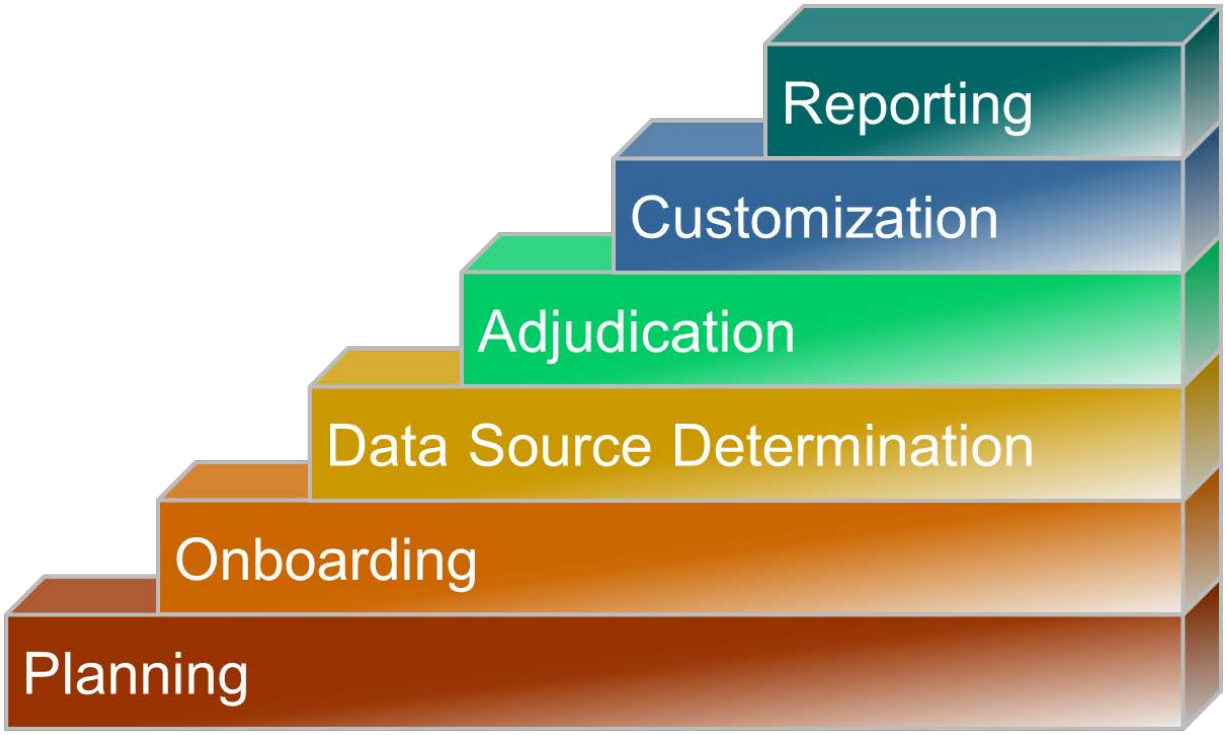


Figure 3: Steps in Treasury's Working System Implementation Processes

Treasury's Working System also includes three key process activities in further support of your implementation, as depicted in **Figure 4**:

- Payment Integration,

- CMAs, and
- Analytics Services.

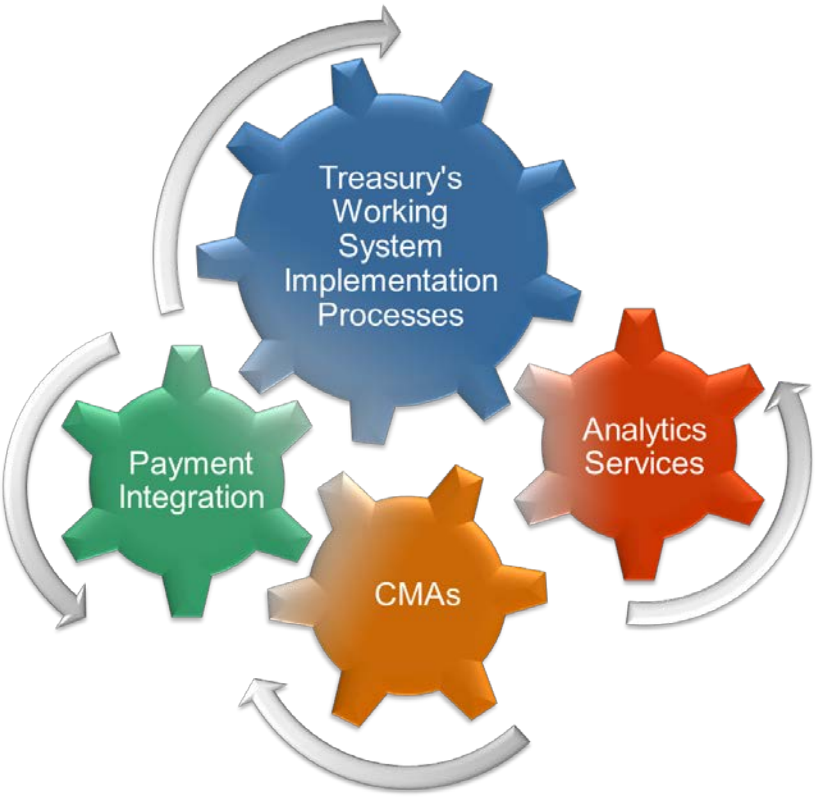


Figure 4: Implementation and Supporting Process Areas

You must have a clear understanding of each process area, its key process activities, which will include your agency specific structure for its payments by Agency Location Code (ALC), and its requirements as you begin your implementation of Treasury's Working System. To prepare for implementation of Treasury's Working System, key points you must consider include:

- How will you plan to integrate Treasury's Working System into your current business activities and payment process?
- What are the requirements to successfully onboard Treasury's Working System?
- How will you determine which data sources are available and appropriate for you in Treasury's Working System?
- Should you develop business rules to refine your matching process?
- How will you properly adjudicate matches to distinguish the validity of payees and/or proper payments and awards from improper payments and awards?

- What are the reporting requirements to provide information to OMB about your experience with Treasury's Working System?

- How do you address the privacy concerns of individuals with respect to the information that you will be accessing?

- How can you maximize your use of Treasury's Working System through analytics services?

How will you plan to integrate Treasury's Working System into your current business activities and payment process?

You will consider each implementation process area, as well as the supporting processes, as you plan to integrate Treasury's Working System into your current business activities and payment process. You must understand your current end-to-end payment processes – from award to disbursement. This includes having a clear understanding of your agency's existing award and payment policies, types of payments, and volume and size (in dollars) of payments. You must also understand your improper payment weaknesses. What is the root cause of the improper payments? How can you prevent them?

Once you have a clear understanding of your current environment, you must engage your agency in Treasury's Working System, beginning with your understanding of its capabilities. Treasury offers support to identify relevant capabilities and determine the appropriate level of interaction with Treasury's Working System most aligned to your business needs. Lastly, you must work with Treasury to complete required forms to initiate the onboarding process. **Section 3.2 Process Area 1: Planning** further discusses the planning process.

What are the requirements to successfully onboard Treasury's Working System?

The onboarding process is heavily dependent on the thoughtful and thorough execution of the planning process activities. You will use the information that you gather and the decisions you make as part of the planning process to establish access within Treasury's Working System. Treasury will work with you to complete a series of onboarding forms to begin your agency's technical conversion to Treasury's Working System. **Section 3.3 Process Area 2: Onboarding** further discusses the onboarding process.

How will you determine which data sources are available and appropriate to you in Treasury's Working System?

Treasury will guide you through the data source matching process to identify specific data sources relevant to your matching needs. With thorough planning, you will assess your data source matching requirements before onboarding. Your assessment will help determine appropriate data source versions (whether public, restricted, or both) and address legal or regulatory obstacles for accessing data sources.

Be aware that matching with public versions of data sources can limit the effectiveness of the matching results. This limitation is often due in part to matching by name only, rather than

matching by name and Taxpayer Identification Number (TIN). This can cause a number of false-positive matches. In most cases, to match on the restricted versions of files, you must establish CMAs. In determining the need for a CMA, you must assess the benefit of having a CMA in place against the workload to establish CMAs. **Section 3.4 Process Area 3: Data Source Determination** further discusses the data source determination process. **Section 5: Computer Matching Agreements** provides further details regarding the CMAs.

Should you develop business rules to refine your matching process?

You may want to develop business rules to refine your matching process and reduce the number of false-positive matches you might receive, and should plan accordingly. The matching customization process focuses on the development of business rules as an iterative process to provide you relevant matches as quickly as possible by agency ALC. **Section 3.6 Process Area 5: Customization** further discusses the customization process.

How will you properly adjudicate matches to determine the eligibility and validity of payees and/or proper payments and awards from improper payments and awards?

When you research a match and determine that it was actually an eligible payee as well as a proper payment, then you would consider that payment a "false positive." To reduce false-positive matches in the future, it is important for you to work with Treasury to identify the agency business rules that resulted in the identification of that payment as a false positive. Once you have identified and obtained approval from Treasury for these business rules, Treasury can incorporate the information provided into your agency's customized business rules. This will aid Treasury in improving the effectiveness of Treasury's Working System. **Section 3.5 Process Area 4: Adjudication** further discusses the adjudication process.

What are the reporting requirements to provide information to OMB about results from your leveraging the Treasury's Working System?

You must report outcome information from your experience with Treasury's Working System along with your annual report to OMB. OMB will include guidance for the submission of this information in the revised OMB Circular A-136, Financial Reporting Requirements (A-136).[11]

How do you address the privacy concerns of individuals with respect to the information that you will be accessing?

If your file includes information about living individuals, a CMA with Treasury may be required to match against most of the restricted files in Treasury's Working System. Through the CMA process, you will receive more reliable results while maintaining the privacy, protection, and due process rights of the individuals. Your legal and privacy officials will help you to address all of your privacy concerns. **Section 5: Computer Matching Agreements** further discusses the CMA process.

[11] Revised October 21, 2013. http://www.whitehouse.gov/sites/default/files/omb/assets/OMB/circulars/a136/a136_revised_2013.pdf.

The main point to consider is how you can use Treasury's Working System to obtain the optimal results. The goal is to reduce the number of improper payments and improper awards. You can achieve this goal by working closely with Treasury and OMB.

3.2 Process Area 1: Planning

The following sections provide an overview of the planning process area, outline the roles and responsibilities of the parties, and describe the key activities involved.

3.2.1 Overview

Planning is a critical process in the implementation of Treasury's Working System. You will make many key decisions during the planning process that will in turn drive the other implementation processes. During this process, you must have a comprehensive understanding of your current controls and processes regarding enrolling payees and be able to evaluate your current end-to-end payment processes and associated controls in relation to Treasury's Working System. As a result, you should seek to obtain a thorough understanding of Treasury's Working System to take full advantage of the functionality it has to offer. Additionally, the need for intra-agency participation is important. You should ensure the involvement of key agency points of contact and authorizing officials who can make decisions and commitments for your agency and/or specific program(s).

To this end, this section will provide you with the proper evaluation methods and metrics to baseline your current end-to-end payment processes, capabilities, controls, and problem areas. In addition, this section will help you identify any gaps in your current processes that you must address before onboarding to Treasury's Working System.

You should take the time to read the entire *Guide* and supplemental materials to gain a thorough understanding of Treasury's Working System necessary for successful planning and subsequent onboarding.

The objectives of the planning process are to:

- Gain an understanding of your current payment stream processes, including policies, types of payments, and volume and dollar value of payments to properly integrate with Treasury's Working System;
- Gain an understanding of your current improper payment weaknesses, as well as root causes of your improper payments;

- Gain an understanding of Treasury's Working System to determine the appropriate level of interaction with the system, identify data file eligibility/permission requirements, and ensure the involvement of appropriate agency personnel; and

- Obtain approval to onboard to Treasury's Working System by completing required forms.

3.2.2 Roles and Responsibilities

Table 1 identifies the roles and responsibilities that must be in place to ensure success of the planning process.

Table 1: Planning Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Baselines current payee enrollment and end-to-end payment stream processes • Identifies impacted systems, data sources, and files/forms • Understands existing agency payment policies and practices, including business rules that describe the business policy or procedures • Identifies types of payments and interfaces used • Evaluates current capabilities in relation to understanding of Treasury's Working System • Identifies key agency personnel
Treasury	• Provides guidance, training, and related artifacts to assist agency planning and preparation • Supports agency's understanding of Treasury's Working System and what it can optimally offer based on each agency's situation

3.2.3 Key Activities

This section defines the planning process and includes the roles performed by both you and Treasury. This process begins with assessing your current end-to-end payment-processing environment. The process ends with completing forms to gain approval to access Treasury's Working System. **Figure 5** provides an overview of the major steps you will perform during the planning process. Although these steps appear in sequence, many activities can occur at the same time. For instance, you can gather information about your agency payment processes while you are also becoming familiar with Treasury's Working System.

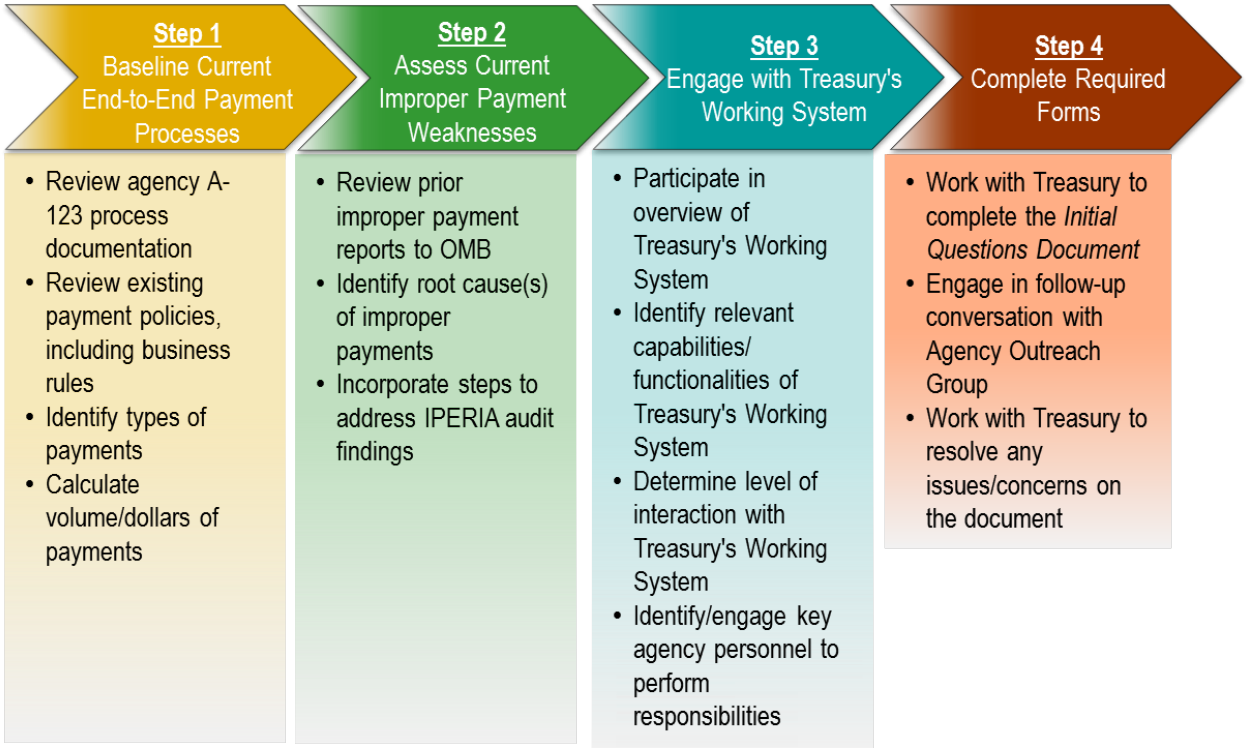
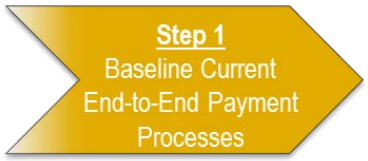


Figure 5: Planning Process Steps

Step 1: Baseline Current End-to-End Payment Processes



To effectively prioritize your needs with respect to Treasury's Working System, you need to understand your current end-to-end payment processes and controls. This will help you in working with Treasury in identifying the best functionality in Treasury's Working System to use in response to those needs. By understanding your capabilities at the onset, you can convey where you can make improvements or where redundancy or duplication exists between agency and Treasury functionality. This will help as you complete required forms and prepare to onboard Treasury's Working System. You can then make the appropriate decisions, in coordination with Treasury, based on a thorough assessment of the current environment, established priorities, and a common vision.

Note that during your implementation of Treasury's Working System, you should update your agency's A-123 process documentation with additional process details regarding the implementation, as appropriate.

To obtain an understanding of your current payment processes, including payment structure for multiple ALCs, you should review your agency's existing process documentation, a product of your agency's implementation of A-123. There are many tools that you can use to describe the current environment. Process mapping, often accompanied by textual descriptions, is one of the most common techniques used in process analysis. Process maps can assist you in understanding the detail of how a process works, and you can

easily annotate them to include information regarding who does the work or where it happens.

You should also review existing policies on your end-to-end payment processes. Within the policies, you may find established business rules and guidelines from establishing payees to processing payments to those payees. You should either adhere to all business rules and guidelines to ensure consistency and compliance when integrating into Treasury's Working System, or incorporate required changes into your plan.

Agencies may issue various types of payments (e.g., benefit, grant, vendor, other). You should identify the types of payments that your agency makes. Once you have identified your agency's payment types, you should determine for which payment types you would use Treasury's Working System. As you determine types of payments, you should also calculate the volume and dollars of those payments. To obtain details on your agency's payment information, you should refer to sources within your agency, including:

- Financial and administrative management systems documentation,
- Payment process documentation and associated policies and procedures, and
- IPIA/IPERA/IPERIA reports.

Table 2 summarizes the key activities, inputs/outputs, and expected outcomes for Step 1.

Table 2: Planning Step 1 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Agency assessment of current payment stream processes and policies	Process analysis	Identified information relative to current payment environment	Understanding of current payee enrollment and end-to-end payment processes, established business rules, and payment universe

Step 2: Assess Current Improper Payment Weaknesses

To get the greatest value from Treasury's Working System, you must gain a thorough understanding of the root causes of improper payments made by your programs. You should prepare for Treasury's Working System integration by gaining a thorough understanding of a variety of areas, including the following:

- Root causes of improper payments;
- Volume/dollars/percentages of improper payments;

- Programs already designated as at high risk of improper payments and subject to IPERIA; and

- IPERIA and/or financial statement audit findings, if applicable.

To obtain details on your agency's causes of improper payments, you should refer to sources within your agency, including—but not limited to—findings from, and corrective action plans associated with, the following:

- Annual Financial Reports or Performance and Accountability Reports,

- Office of Inspector General (OIG) reports, and

- Other agency-produced reports on compliance with IPERIA.

Table 3 summarizes the key activities, inputs/outputs, and expected outcomes for Step 2.

Table 3: Planning Step 2 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Agency assessment of improper payment problem areas	Reporting, sampling, and observations	Quantification of number of, and reasons for, improper payments	Understanding of causes of improper payments to better use Treasury's Working System

Step 3: Engage with Treasury's Working System

Once you make contact with Treasury, Treasury will provide to you a general overview of Treasury's Working System. That overview will offer insights into the system, including but not limited to:

- Improper payments legislation and other relevant Executive Branch regulation, guidance, and memoranda;

- Components of Treasury's Working System;

- System functionality;

- Payment process integration stages;

- Matching results review process; and

- Next steps.

Treasury works with you to identify and understand your business processes and identify which of Treasury's Working System offerings are best suited for you. Treasury follows a standard

course of action for large and small agencies, but will customize approaches based on your individual needs and/or requests.

As you integrate your agency into Treasury's Working System, you need to determine which data sources you have the ability and/or permission to access. For instance, you may have authority to match against the restricted versions of files; alternatively, you may be restricted to matching against only the public versions of files. Treasury will work with you during the onboarding and data source matching processes to identify appropriate data sources to suit your agency's needs. You will initially document and provide this information to Treasury during Step 1 of the onboarding process. During the data source matching process, you will need to share regulatory/legal basis and other supporting documents to assist Treasury in determining which data sources you can access. **Section 3.4 Process Area 3: Data Source Determination** will further discuss the data source matching process.

In addition, you must determine the method by which you will search, send, and receive data through Treasury's Working System. You will document and provide this information to Treasury during Step 1 of the onboarding process. Treasury's Working System provides you with four options, as depicted in **Figure 6.**

Figure 6: Option for Matching Methods

For more information on payment integration, refer to **Section 4: Payment Integration.**

Furthermore, you must determine the appropriate stage(s) at which to integrate Treasury's Working System with your current payee enrollment and payment process. In doing so, you must consider the most appropriate time to perform matching. **Figure 7** depicts the various timing considerations to perform matching.

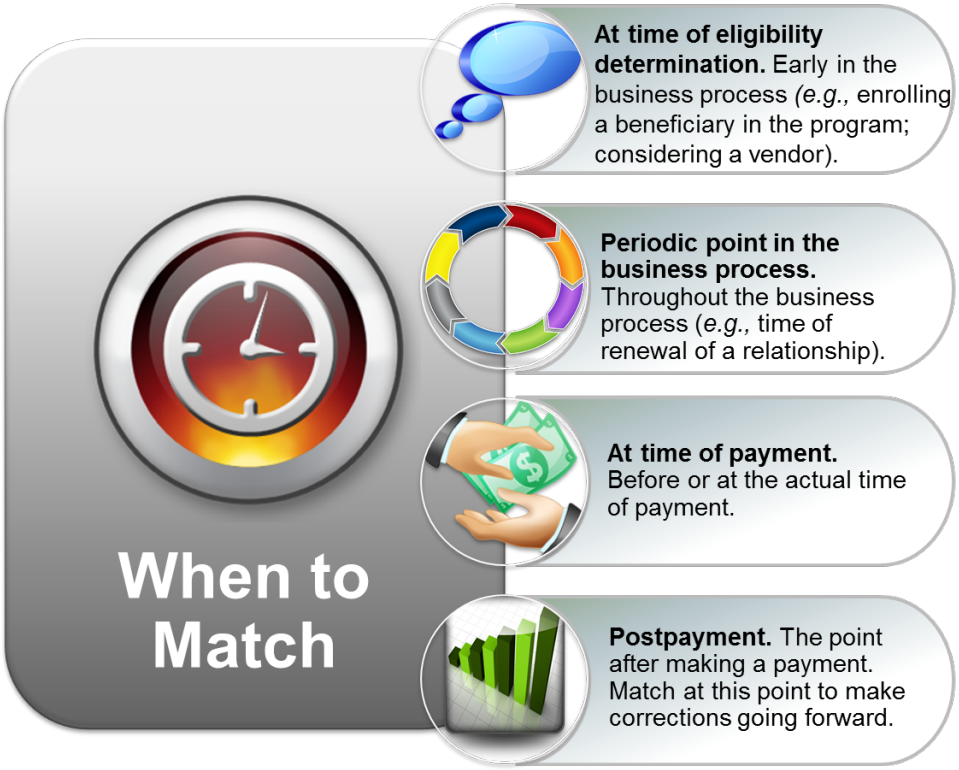


Figure 7: Timing Considerations for Matching

When determining your point of integration with Treasury's Working System, you must consider your business cycle and where in your current payment process may be best for you to integrate with the system. At the highest level, you can integrate with Treasury's Working System at four stages: (1) Preaward, (2) Prepayment, (3) At time of payment, and (4) Postpayment. Each stage has considerations of timing when performing matches. **Figure 8** depicts the four stages of business process integration and what you should consider as you identify the appropriate stage(s) at which to integrate with Treasury's Working System, including when to match.

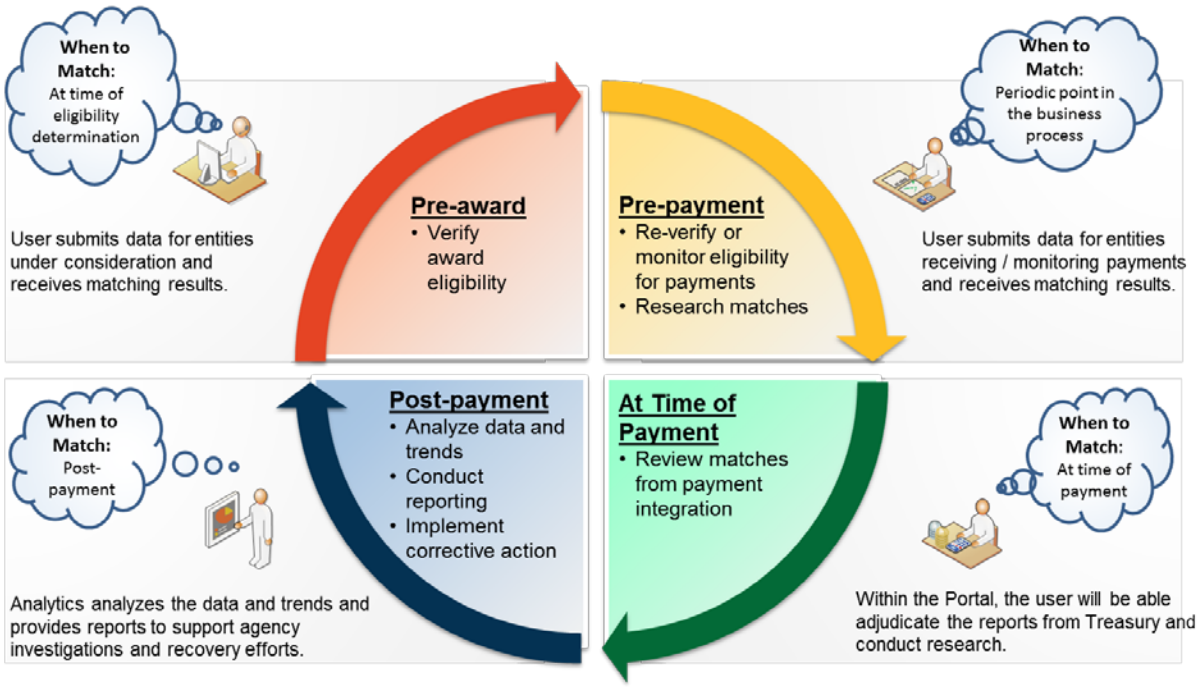


Figure 8: Treasury's Working System Business Process Integration Stages

To maximize the benefits you receive from Treasury's Working System, you should ensure the involvement of key agency points of contact and authorizing officials who can make decisions and commitments for your agency and/or specific program(s). In many agencies, the group working to implement Treasury's Working System is separate from the group that is tracking and reporting on improper payments for the agency. To have the most effective implementation of Treasury's Working System, it is important that both groups have close communication and understanding of the improper payment challenges for the agency. Although you may identify additional personnel, **Figure 9** depicts the key personnel you should include.

Figure 9: Recommended Key Agency Personnel

Table 4 summarizes the key activities, inputs/outputs, and expected outcomes for Step 3.

Table 4: Planning Step 3 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Briefing on the capabilities of Treasury's Working System	Past experiences with implementing Treasury's Working System	Briefing	Understanding of the Treasury's Working System capabilities
Determine method(s) to interact with Treasury's Working System	Briefings and meetings on online, batch matching, and continuous monitoring	Method or methods chosen	Optimal use of Treasury's Working System
Determine data sources to match against	Briefing on data sources Legal review of access allowed	Data sources determined and which version (public/restricted)	Optimal use of Treasury's Working System
Determine which stage(s) of your business processes to perform matching with Treasury's Working System	Review of agency business processes to determine best place(s) to match	Decision on matching location in the agency business process	Optimal use of Treasury's Working System
Engage all key personnel to complete process, including Legal, Privacy Officer, Office of Chief Financial Officer (OCFO), Program Office, etc.	Identification of key personnel	Key personnel engaged in process	Faster conversion of agency to Treasury's Working System

Step 4: Complete Required Forms

After initial engagement with Treasury's Working System, Treasury works with you to complete the *Initial Questions Document* (**Appendix F**). Once completed, Treasury holds a follow-up conversation with you to review the information and ask any additional questions. Sample questions may include, but are not limited to, the following:

- What types of payments do you make (e.g., benefit, grant, vendor, other)?
- What are your average monthly volumes of improper payments processed?
    - How do you identify those improper payments?
- For each type of payment, which criteria (e.g., data elements) do you use to determine eligibility of the payment recipient?
    - Is the TIN on the file?

- For each type of payment, which criteria could you use to determine ineligibility?
    - Is there a secondary beneficiary?

Table 5 summarizes the key activities, inputs/outputs, and expected outcomes for Step 4.

Table 5: Planning Step 4 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

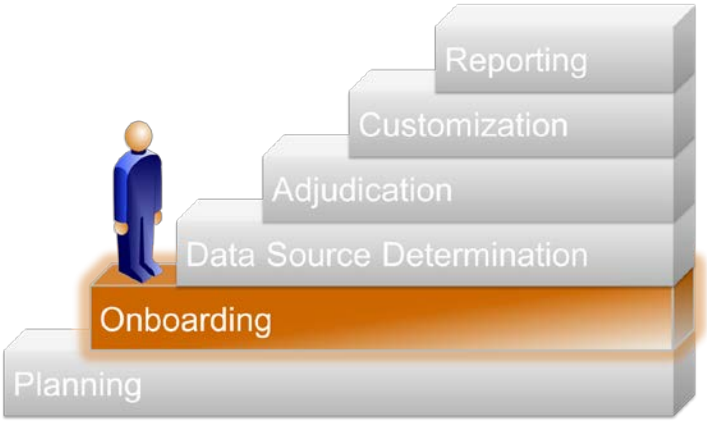
Key Activities	Inputs	Outputs	Expected Outcomes
Complete *Initial Questions Document*	Obtain answers from key personnel	Completed *Initial Questions*	Ability to move on to the next process of signing up for Treasury's Working System
Treasury Legal Department reviews and gives approval	*Initial Questions*	Decision on approval	Ability to move forward with onboarding

3.3 Process Area 2: Onboarding

The following sections provide an overview of the onboarding process area, outline the roles and responsibilities of the parties, and describe the key activities involved.

3.3.1 Overview

The onboarding process is heavily dependent on the successful execution of the planning process activities. As emphasized in the planning process, you will need to obtain a comprehensive understanding of Treasury's Working System to take full advantage of what Treasury's Working System has to offer.



Treasury must approve your *Initial Questions Document*, as completed during Step 4 of the planning process, to initiate the onboarding process. During the onboarding process, you will act on the decisions you made during the planning process, such as your agency's level of interaction with the system, to access Treasury's Working System. Onboarding activities primarily focus on your agency's technical conversion to the Treasury's Working System, as depicted in **Figure 10.**

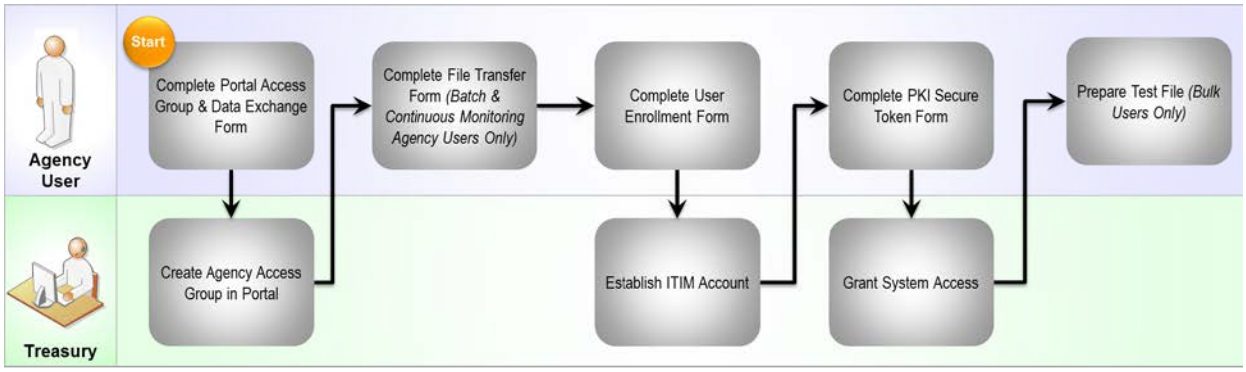


Figure 10: Onboarding's Technical Conversion Process

The objectives of the onboarding process are to:

- Gain access to Treasury's Working System and
- Ensure that your agency files are ready for production in Treasury's Working System.

3.3.2 Roles and Responsibilities

Table 6 identifies the roles and responsibilities that must be in place to ensure success of the onboarding process.

Table 6: Onboarding Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Establishes the Access Group to determine to which databases the agency needs access • Determines how the Access Group sends and receives files • Grants agency users permission to Treasury's Working System • Works with analytics services to identify needs
Treasury	• Provides oversight and customer assistance for the onboarding process • Provides users with an Internet-based single entry point for multiple data sources

3.3.3 Key Activities

This section defines the onboarding process and includes the roles performed by you and Treasury. You initiate this process by requesting access to the Treasury's Working System, and it ends with the establishment of individual user access to onboard the Treasury's Working System. **Figure 11** provides an overview of the major steps you will perform during the onboarding process.

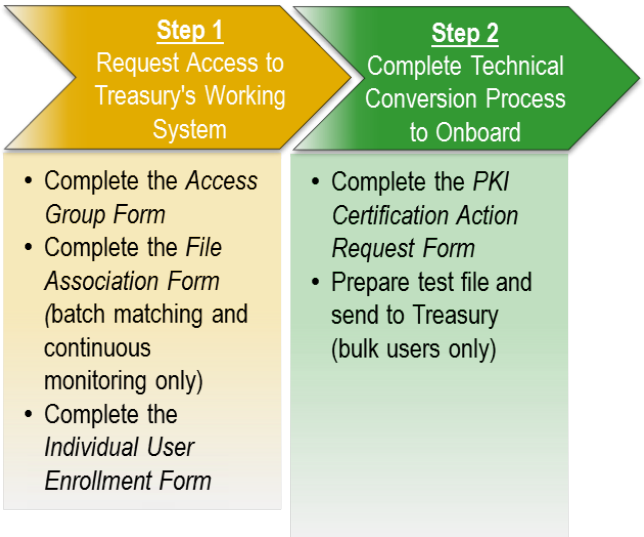


Figure 11: Onboarding Process Steps

Step 1: Request Access to Treasury's Working System

To begin your agency's technical conversion to Treasury's Working System, you must complete the *Portal Access Group and Data Exchange Form* (**Appendix F**). The form allows Treasury to grant you access to Treasury's Working System by establishing the Access Group and your agency's authorizing official(s) for the Access Group. In this form, you will identify the restricted and unrestricted data sources you will need to access. **Section 3.4 Process Area 3: Data Source Determination** provides details to identify data sources relevant to your matching needs. You will also identify the method by which your Access Group will search, send, and receive data.

To access the batch matching and continuous monitoring matching functions, you must establish a secure file transfer process by completing the *File Association Form* (**Appendix F**). For 10 or more users, Treasury provides the *Batch User Enrollment Spreadsheet*. The *File Association Form* establishes the rules of connection between you and Treasury's Working System. Complete a new form for each type of payment file submitted (e.g., benefit, vendor).

Upon completing the forms regarding the secure file transfer process, you must complete the *Individual User Enrollment Form* (**Appendix F**) for each user requesting access to your Access Group. The form enrolls users into Treasury's Working System and establishes an IBM Tivoli Identity Manager (ITIM) account. To access Treasury's Working System, users must gain access to ITIM, which is Treasury's Working System User Provisioning System.

Step 2: Complete Technical Conversion Process to Onboard

After completing the *User Enrollment Form*, each user completes the Public Key Infrastructure (*PKI) Certification Action Request Form* (**Appendix F**). The *PKI Certification Action Request Form* collects your demographic data to provide you with a Treasury-issued secure PKI token to access Treasury's Working System. Treasury works with you to gather credentials and supplementary information to provision the PKI token. If you already have a Treasury-issued PKI token, you should consult with Treasury to determine whether the previously issued Treasury PKI tokens are usable for the purposes of Treasury's Working System. For technical specifications regarding agency user enrollment, refer to the *Do Not Pay User Enrollment Guide*.

After completing the *PKI Certification Action Request Form*, you must make certain that each user agrees to the portal *Rules of Behavior* agreement form. Treasury will e-mail each user and allow a five-day window to submit the agreement. Treasury will only administer PKI tokens to users upon receipt of the *Rules of Behavior* agreement form.

If you are planning to access the batch matching and continuous monitoring functionalities, you must submit a test file to Treasury's Working System. Treasury performs a test of your file. If the file processes properly, Treasury informs you that the test file has passed, and you are ready to move forward with sending production files.

Once it identifies initial matches, Treasury reaches out to you gain a better understanding of your business processes and policies. Treasury conducts follow-up discussions, as necessary, to help you get the most from Treasury's Working System; system customizations are available upon request to optimize your matching results.

Table 7 summarizes the key activities, inputs/outputs, and expected outcomes for the onboarding process.

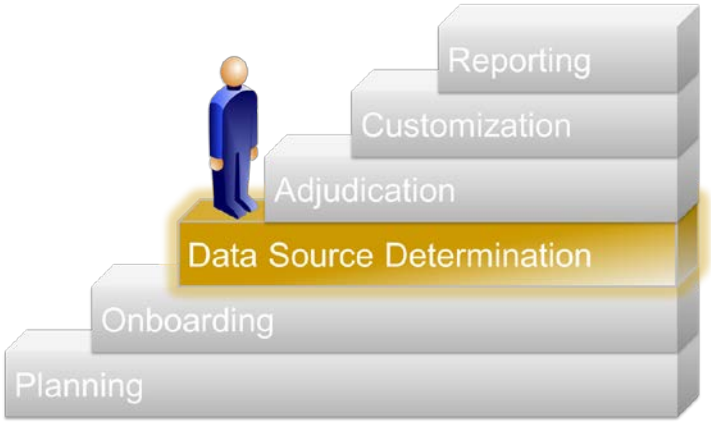
Table 7: Onboarding – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Begin technical conversion process	Legal decision on agency access Agency decision on method of access	Beginning of technical conversion	Ability to move forward with onboarding
Complete Access Group Form	Meetings and research to complete needed data	Completed *Access Group Form*	Ability to move forward with onboarding
Create Portal Access Group	Completed *Access Group Form*	Portal Access Group created	Ability to move forward with onboarding
Agency batch and continuous monitoring users complete File Association Form	Research to obtain needed data	Completed *File Association Form*	Ability to move forward with onboarding
Complete User Enrollment Form	Data from potential users	Completed *User Enrollment Form*	Ability to move forward with onboarding
Create user ITIM account	Completed *User Enrollment Form*	ITIM account created	Agencies are able to access Treasury's Working System once they obtain PKI token
Complete PKI Secure Token Form	Research to obtain needed data	Completed *PKI Secure Token Form*	Obtain Treasury's Working System access
Grant access to Treasury's Working System	Completed *PKI Secure Token Form*	Agency set to access Treasury's Working System	Agency is live on Treasury's Working System
Bulk and continuous monitoring user completes file test	Test file	Completed test	Ready to begin live bulk and continuous monitoring

3.4 Process Area 3: Data Source Determination

The following sections provide an overview of the data source determination process area, outline the roles and responsibilities of the parties, and describe the key activities involved.

3.4.1 Overview



During this process, you will identify specific data sources relevant to your matching needs. During the planning process, you would have thought through your data source determination requirements, as well as regulations, policies, and procedures supporting your data matching requirements. You would have also gained an understanding of data sources available through Treasury's Working System. During the data source determination process, Treasury continues to work with you to identify and understand your business processes and identify data sources best suited for you. Treasury matches against IPERIA mandated data sources. Each data source differs in match strength and core data elements.

The objectives of the data source determination process are to:

- Optimally identify data sources best suited for you;
- Determine appropriate data source versions (e.g., public and/or restricted); and
- Identify and communicate legal or regulatory obstacles for accessing data sources, and determine the best method to address these obstacles.

3.4.2 Roles and Responsibilities

Table 8 identifies the roles and responsibilities that must be in place to ensure success of the data source determination process.

Table 8: Data Source Determination Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Identifies IPERIA mandated data sources to support matching • Determines appropriate data source versions (e.g., public/restricted) • Identifies, communicates, and addresses legal/regulatory obstacles for accessing data sources
Treasury	• Supports agency in data source determination process

3.4.3 Key Activities

This section defines the data source determination process and includes the roles performed by both you and Treasury. This process begins with you identifying data sources to support your matching needs and requirements, and ends with identifying and communicating your legal and regulatory obstacles for accessing data sources. **Figure 12** describes the steps in the data source determination process.

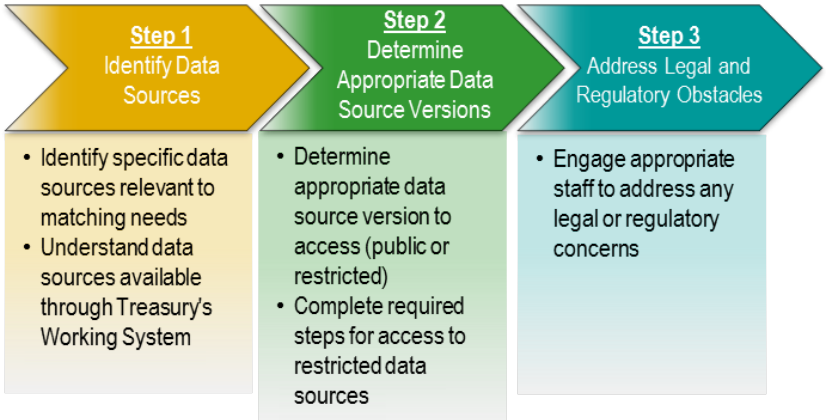


Figure 12: Data Source Determination Process Steps

Step 1: Identify Data Sources

During this step, you will work with Treasury to identify the data sources best suited for your data source matching requirements. Treasury's Working System matches against the following IPERIA mandated databases:

- ***Death Master File (DMF):*** Listing of deaths reported to the Social Security Administration (SSA).
- ***System for Award Management (SAM) Exclusion Records (referred to in IPERIA as Excluded Party List System) (EPLS):*** Listing of individuals and firms excluded from receiving new Federal awards, including contracts, grants, and other financial assistance; and individuals and companies owned or controlled by targeted countries.
- ***Treasury Offset Program (TOP) Debt Check:*** Delinquent child support and non-tax debt owed to the Federal government.
- ***Credit Alert System or Credit Alert Interactive Voice Response System (CAIVRS):*** Shared database of Federal debtors who are in default, have had claims paid on direct or guaranteed Federal loans, or are delinquent on other debts owed to Federal agencies.
- ***List of Excluded Individuals/Entities (LEIE)***: Individuals and entities currently excluded from participating in Federal healthcare programs, such as Medicare and Medicaid.

- ***Prisoner Update Processing System (PUPS):*** Listing of confined individuals excluded from receiving payment of Retirement, Survivors, or Disability Insurance (RSDI) and Supplemental Security Income (SSI) benefits. These individuals may be excluded from other types of Federal payments, dependent on agency regulations.

For additional information on IPERIA mandated data sources available through Treasury's Working System, refer to **Appendix G.**

IPERIA also provides that OMB may choose additional databases for inclusion in Treasury's Working System. OMB Memorandum M-13-20 provides further guidance on this vetting process for additional databases, including what factors OMB considers for additional databases. Treasury may only use or access additional databases for Treasury's Working System once OMB has officially designated such databases for inclusion, except as provided by law. Before designating additional databases, OMB will perform the following sequence of activities:

1. Publish a 30-day notice of the designation proposal in the Federal Register asking for public comment;

2. Decide to finalize the designation at the conclusion of the 30-day comment period; then

3. Publish a notice in the Federal Register to officially designate the database for inclusion in Treasury's Working System.

Table 9 summarizes the key activities, inputs/outputs, and expected outcomes for Step 1.

Table 9: Data Source Determination Step 1 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Identify data source matching requirements	Agency discussions and meetings with Treasury	Documented agency requirements for data source determination	Data source determination requirements identified and documented

Step 2: Determine Appropriate Data Source Versions

For certain IPERIA mandated data sources, two versions are available through Treasury's Working System: public and restricted. If you want to perform batch matching or continuous monitoring on restricted versions of data sources, you may need CMAs if the files you are matching contain information about living individuals. To improve matching results and reduce false positives, you should leverage restricted data sources and where possible match against those restricted versions. Restricted data sources offer access to additional data elements. For additional information on the CMA process, refer to **Section 5: Computer Matching Agreements.**

Each data source offers different levels of match strength, contingent upon the data elements that make up the data source. Treasury's Working System identifies three types of match strength, as depicted in **Figure 13:** conclusive, probable, and possible.

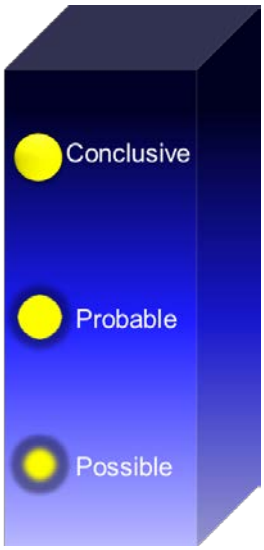


Figure 13: Matching Strength Types

Data sources with conclusive matches provide the optimal matching results. Conclusive matches compare data elements, including, but not limited to:

- Data Universal Numbering System (DUNS) + Name
- Social Security Number (SSN) + Name
- TIN + Name
- Employee Identification Number (EIN) + Name
- Address + Name

Table 10 summarizes the key activities, inputs/outputs, and expected outcomes for Step 2.

Table 10: Data Source Determination Step 2 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Determine appropriate data source version to access (public/ restricted)	Review of available data sources	Documented agency requests	Data source version identified and communicated
Complete required steps for access to restricted data source versions	Determination that restricted data source matching needed	Completed CMA, if required (see **Section 5: Computer Matching Agreements)**	Agency receives access to restricted data source versions

Step 3: Address Legal and Regulatory Obstacles

Treasury works with you to identify and communicate legal or regulatory obstacles for accessing data sources and to determine the best method to address these obstacles. Engage your legal/privacy staffs and Data Integrity Board (DIB) to properly address any legal or regulatory concerns.

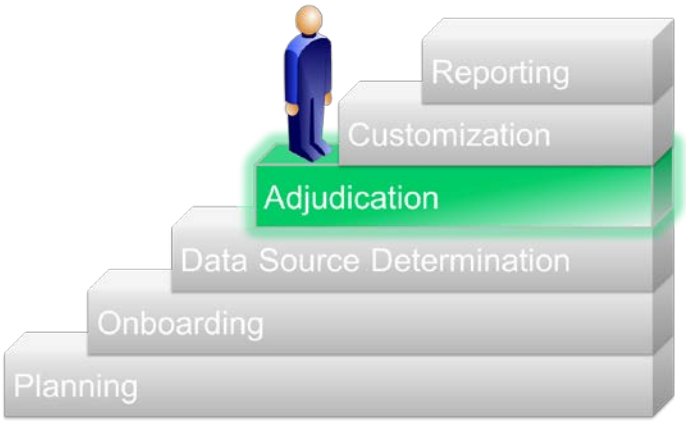


Table 11 summarizes the key activities, inputs/outputs, and expected outcomes for Step 3.

Table 11: Data Source Determination Step 3 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Legal decision on data sources that can be matched	Agency legal authorities	Decision on data sources	Approved data sources

3.5 Process Area 4: Adjudication

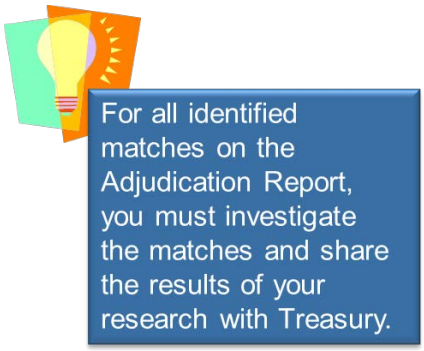
The following sections provide an overview of the adjudication process area, outline the roles and responsibilities of the parties, and describe the key activities involved.

3.5.1 Overview

Adjudication and matching customization are evolutionary processes – the more effort you expend up front, the more efficient and effective these processes will be in the future. Adjudication, in sync with matching customization, allows for significantly improved identification of prospective improper payments and reporting, as required under IPERIA.

During the adjudication process, you are responsible for reviewing matches generated through the matching process. As such, you must determine, based on further investigation and internal policies, whether a match identifies an invalid payee and constitutes an improper payment, and if so, you must initiate the proper actions.

This research should confirm whether the match was an ineligible payee and the payment improper. If it was not an improper payment, then you must identify why the payment was deemed proper. When you have researched a match and determined that it was actually an appropriate payee, then you would consider it a "false-positive" match. To reduce false-positive matches in the future, it is important for you to work with Treasury to identify the agency business rules that resulted in the identification of that payee as a false positive. Once you and Treasury identify and approve these business rules, Treasury can incorporate the information provided into your agency's customized business rules. For details on the business rule development process, refer to **Section 3.6 Process Area 5: Customization.** Through this aspect of the adjudication process, you will receive more targeted and improved results, reducing the likelihood of similar false positive matches.



The adjudication process in its current state appears in **Figure 14.**

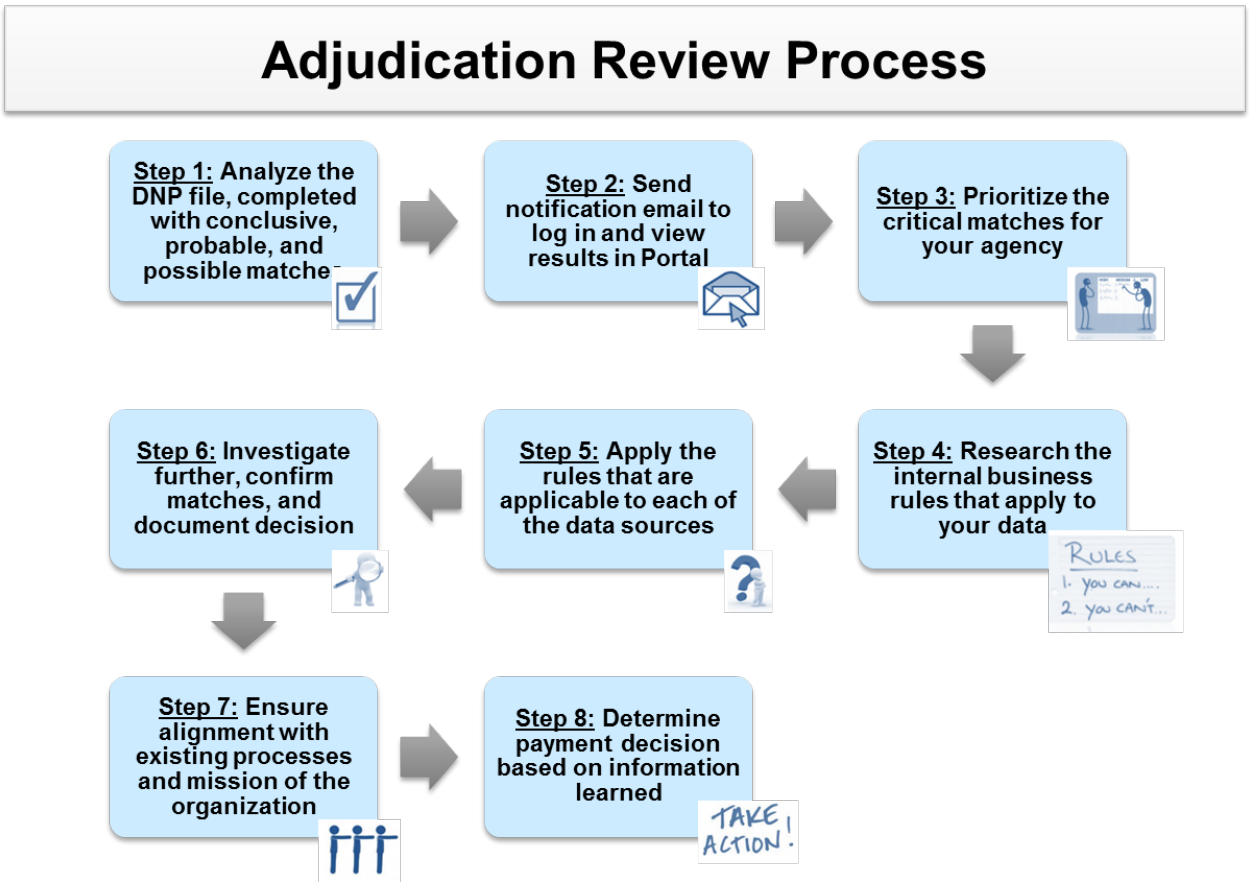


Figure 14: Adjudication Review Process

The objectives of the adjudication process are to:

- Research matches captured through Treasury's Working System processes to determine whether matches indicate an ineligible payee and/or an improper payment. Information on the PACER matching may be included as well. The PACER process will continue to be manual for the immediate future;

- Implement a sustainable process for defining business rules to address eligible payees and/or proper payments that were incorrectly captured in Treasury's Working System reports;

- Develop, refine, test, and implement business rules for improving the matching process as a result of adjudication; and

- Refine, implement, and test adjudication processes to monitor accuracy of business rules.

3.5.2 Roles and Responsibilities

Table 12 identifies the roles and responsibilities that must be in place to ensure success of the adjudication process.

Table 12: Adjudication Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Investigates matches from Adjudication Report • Reports feedback to Treasury through documenting decisions and completing Adjudication Report (NTDOs do not complete Adjudication Report) • Provides supporting documentation (e.g., rules, policies, regulations) for matches that were deemed to be proper, "false positives"
Treasury	• Matches files against Treasury's Working System • Creates Adjudication Report • Reviews and approves proposed business rules and supporting documentation, and determines whether request can be implemented

3.5.3 Key Activities

This section defines the adjudication process and includes the roles performed by you and Treasury. This process begins by Treasury matching your files against Treasury's Working System, and it ends with you conducting a review of internal processes. **Figure 15** describes the iterative adjudication process.

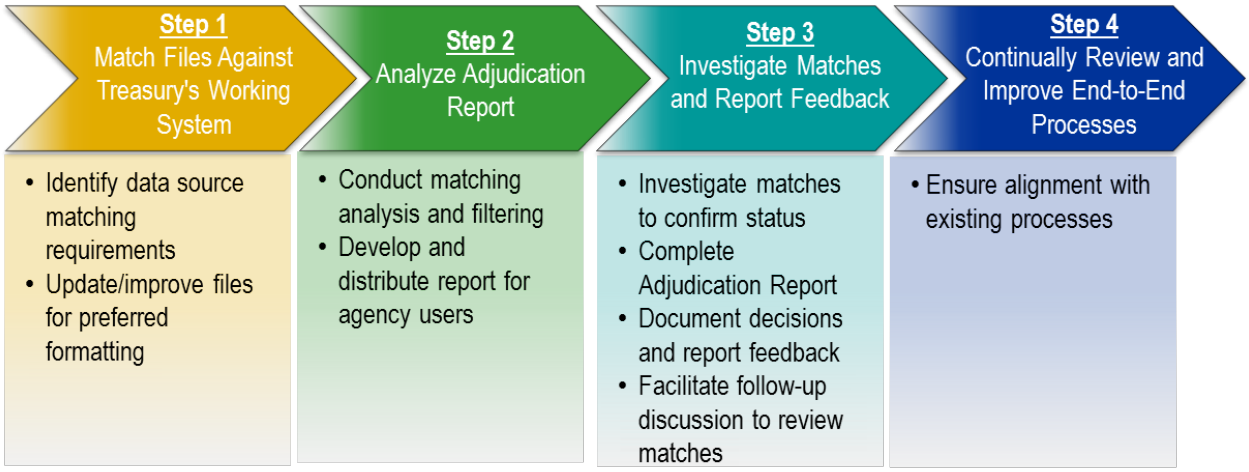


Figure 15: Adjudication Process Steps

Step 1: Match Files Against Treasury's Working System

During this step, match your files against Treasury's Working System. To improve efficiency in the matching process, refer to the *Do Not Pay User Enrollment Guide* for specified formatting guidelines and recommendations. Throughout the matching process, you need to work collaboratively with Treasury. This collaborative approach will lead to efficient and effective match results. Here are a handful of considerations when matching against Treasury's Working System:

- Consider how you would internally use certain data sources to identify and remediate improper payments;
- Matching improves if a unique identifier is included (e.g., Death Master File requires SSNs or TINs to receive matching results);
- Matching accuracy depends on the accuracy and number of unique identifiers given/available (e.g., SAM Exclusion Records matching requires DUNS and names to get strong matching results);
- Matching improves when payee/vendor address is given; and
- Consider implementing CMAs where possible because restricted data sources have the ability to match on information such as TINs, which would enhance matching.

Table 13 summarizes the key activities, inputs/outputs, and expected outcomes for Step 1.

Table 13: Adjudication Step 1 – Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Agencies match files against Treasury's Working System	Agency file	Match results in Adjudication Reports	Successful matching results on Adjudication Reports

Step 2: Analyze Adjudication Report

During this step, Treasury starts by comparing your files with the appropriate data sources. Following comparisons of your files with the appropriate data sources, Treasury will conduct analysis and filtering. Treasury will then create the Adjudication Report (**Appendix F**), which includes:

- Summary of matches by Agency Location Code (ALC);
- Spreadsheet listing of each match by TIN and including data about the payment and data found in the data sources; and
- Explanations of the data used and matching process.

You may request that additional information accompany the Adjudication Report. Coordinate follow-up discussions with Treasury to determine additional information attainable through Treasury's Working System. Treasury securely sends the Adjudication Report to your designated contacts. At this time, Treasury is sending you one report. It is currently not broken out for specific bureaus or programs. For customized reporting procedures, you should contact Treasury. In the future, releases of the Adjudication Report will be available online in the Treasury's Working System. Your designated users may review the report and distribute it to the appropriate program users for adjudication.

Table 14 summarizes the key activities, inputs/outputs, and expected outcomes for Step 2.

Table 14: Adjudication Step 2 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Create Adjudication Report	Agency files Business rules	Complete Adjudication Report	Adjudication Report is complete and ready for agency review
Securely send Adjudication Report to agency	Adjudication Report Listing of approved agency users	Adjudication Report received by agency users	Adjudication Report is securely sent and received by authorized agency users

Step 3: Investigate Matches and Report Feedback

During this step, you report feedback to Treasury through the Adjudication Report. Non-Treasury Disbursing Offices (NTDOs) do not send their feedback through the Adjudication Report. NTDOs will send their results through the annual reporting process as described in **Section 3.7 Process Area 6: Reporting.** Most agencies will follow the steps as described in this section. Treasury is available to answer any questions or concerns that you may have. You can request a meeting to review and discuss match results within several days of receiving your match results.

At a minimum, you should review matching results and assess:

- Which payments are proper and improper and
- Whether additional or improved business rules could help Treasury provide more useful reports.

When you have identified proper payments on the Adjudication Report, you should contact Treasury to discuss the business rule and supporting legal/regulatory documentation for making the payments. When you identify improper payments, you should take appropriate action to suspend the payee or stop, cancel, or reclaim the payments, as appropriate. If the payments are recurring, you must ensure that controls are in place to avoid making the payments in future months.

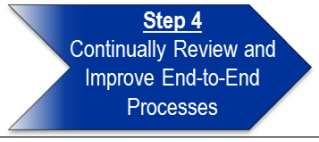
Leverage the adjudication review process as much as possible to provide information on actions taken.

Table 15 summarizes the key activities, inputs/outputs, and expected outcomes for Step 3.

Table 15: Adjudication Step 3 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Investigate matches and document decisions	Match results	Documented decisions of proper/improper matches on Adjudication Report	All matches are investigated and documented on Adjudication Report
Report feedback to Treasury	Adjudication Report Supporting documentation for proper/improper matches	Feedback collected	Treasury collects feedback provided by agency

Step 4: Continually Review and Improve End-to-End Processes



During this step, you should continually review and refine your internal payee enrollment and end-to-end payment processes to ensure

that the continual refinement and improvement of controls are in place to help mitigate and eliminate the issuance of improper payments in future periods. Per IPERIA, you should design internal processes to help reduce and recover improper payments. As such, Treasury's Working System is just one tool designed to help you achieve IPERIA compliance requirements. You will need to look at your whole internal control environment to assess your compliance with the IPERIA requirements, which include:

- Conducting specific risk assessments for each program or activity,
- Publishing improper payments estimates for all programs and activities susceptible to significant improper payments under their risk assessments;
- Establishing goals toward reaching annual reduction targets; and
- Reporting information on efforts toward achieving established goals and resulting metrics regarding the identification and recapture of improper payments.

Table 16 summarizes the key activities, inputs/outputs, and expected outcomes for Step 4.

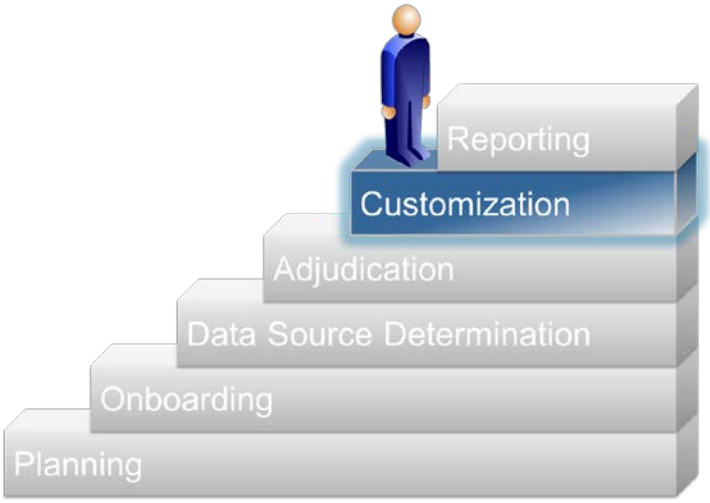
Table 16: Adjudication Step 4 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Inputs	Output	Expected Outcome
Review existing processes and revise accordingly	Internal control processes IPERIA compliance documentation	Improved IPERIA compliance processes	IPERIA compliance procedures are improved

3.6 Process Area 5: Customization

The following sections provide an overview of the matching customization process area, outline the roles and responsibilities of the parties, and describe the key activities involved.

3.6.1 Overview



Matching customization allows you to refine the matching process and reduce the number of false positive matches you may receive. You may have legislation or regulations that would allow you to make payments that would otherwise identify as potential improper payments within Treasury's Working System. To isolate these matches and reduce false positives, it may be necessary for you to further refine your implementation of

Treasury's Working System by creating business rules that you can use to narrow the matches down. The business rule development process is an iterative process to help refine matching, as depicted in **Figure 16.**

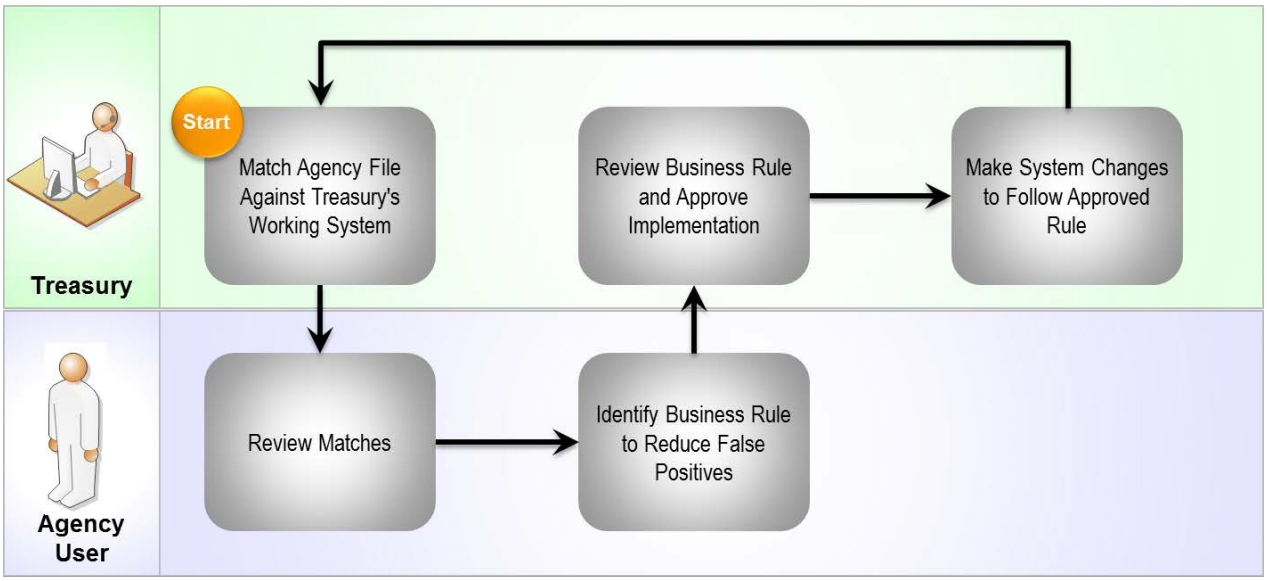


Figure 16: Business Rule Development Process

The objectives of the matching customization process are to:

- Reduce false positives through isolating proper payments incorrectly captured in Treasury's Working System;
- Develop good, clean, and usable payment data;
- Integrate payment stream to build approved business rules through automation; and
- Develop an iterative process to provide relevant matches as quickly as possible.

3.6.2 Roles and Responsibilities

Table 17 identifies the roles and responsibilities that must be in place to ensure success of the matching customization process.

Table 17: Matching Customization Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Supports business rule development for Treasury's Working System customization • Develops business rules based on legal, legislative, and regulatory authority • Provides documentation supporting business rules
Treasury	• Provides support throughout the business rule development process • Reviews requests for new business rules, and obtains approval • Builds and automates approved business rules into Treasury's Working System

3.6.3 Key Activities

This section defines the matching customization process and includes the roles performed by both you and Treasury. This process begins with your identification and communication of business rules and ends with Treasury customizing Treasury's Working System for implementing business rules. **Figure 17** describes the iterative matching customization process.

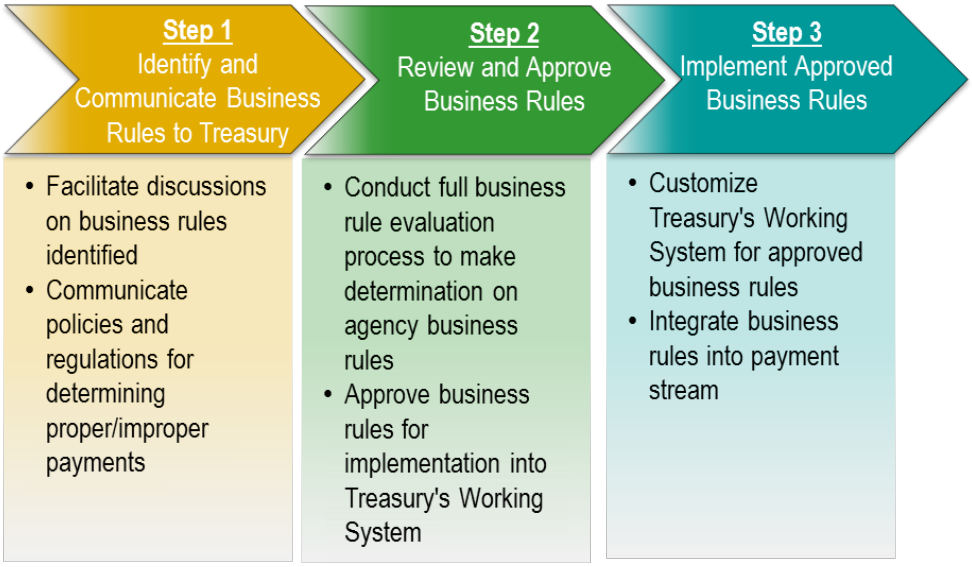


Figure 17: Customization Process Steps

Step 1: Identify and Communicate Business Rules

To ensure efficient and effective usage of Treasury's Working System, you must work with Treasury to identify and communicate business rules. To capture effective business rules, you need to understand data in your payment files. Treasury often matches your payment files against Treasury's Working

System. Therefore, for the match to be effective, it is important that the payment file captures the right information. Issues can range from missing or inaccurate TINs to secondary TINs missing for beneficiaries. If information on the payment file is incorrect or incomplete, the matching result will be ineffective. This incomplete data on the payment file is an issue that impacts other Treasury's Working System processes, including onboarding and payment integration.

Business rules should explicitly define when a payment to an individual or entity listed on a data source is proper. These business rules need to be developed based on legislative/regulatory authority and document the reason that a match identified in Treasury's Working System is actually a valid payment. To facilitate the approval process, you should share the legal/regulatory basis for business rule requests with Treasury.

Table 18 summarizes the key activities, inputs/outputs, and expected outcomes for Step 1.

Table 18: Customization Step 1 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Identify business rules	Discussions with agency	Documented business rules	Agencies have identified and documented business rules
Facilitate discussions on business rules identified	Follow-up discussions on business rules	Universe of business rules	Agencies discuss potential business rules with Treasury to identify universe of business rules
Communicate improper payments policies and regulations	Distribution/sharing of agency internal improper payments policies/regulations	Determination of business rule validity	Appropriate policies and regulations have been shared and discussed to determine validity of business rules

Step 2: Review and Approve Business Rules

For proposed business rules, Treasury has established a full business rule governance process. As noted in Step 1, business rules must have a legal/regulatory basis for acceptance. Treasury will review proposed business rule requests against the legislative authority provided and make an accurate determination/ruling.

Treasury maintains an updated database of business rules for each agency. You should review these rules monthly to ensure validity. You need to be proactive and communicate business rule revisions to Treasury. This ensures that the matching process is updated and accurate.

If you identify that you need a new business rule, you must submit it to Treasury for approval into Treasury's Working System. Treasury will inform you on the business rule decision and subsequent implementation process/timeline.

Treasury may reject business rules if they lack a legal/regulatory basis. In these instances, Treasury informs you of its rejection decision for the business rule request. Review Step 1 for resubmitting business rules.

Table 19 summarizes the key activities, inputs/outputs, and expected outcomes for Step 2.

Table 19: Matching Customization Step 2 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Conduct full business rule evaluation process to make determination on agency business rules	Business rules identified and all supporting documentation	Approval/Rejection of business rules	Universe of business rules reviewed and approved or rejected
Communicate revisions to business rules	Revisions identified and documented through Treasury review	Business rules revised, as necessary	Business rules are revised for Treasury's Working System implementation
Approve business rules for implementation into Treasury's Working System	Listing of revised business rules	Business rules approved for implementation into Treasury's Working System	Business rules are approved and ready for implementation into the Treasury's Working System

Step 3: Implement Approved Business Rules

After completing review and approval, Treasury customizes Treasury's Working System for your approved business rules. Integrating business rules into the matching process is critical to providing customized and effective matching results. As such, you need to establish strong, ongoing communication with Treasury throughout the matching customization process.

Table 20 summarizes the key activities, inputs/outputs, and expected outcomes for Step 3.

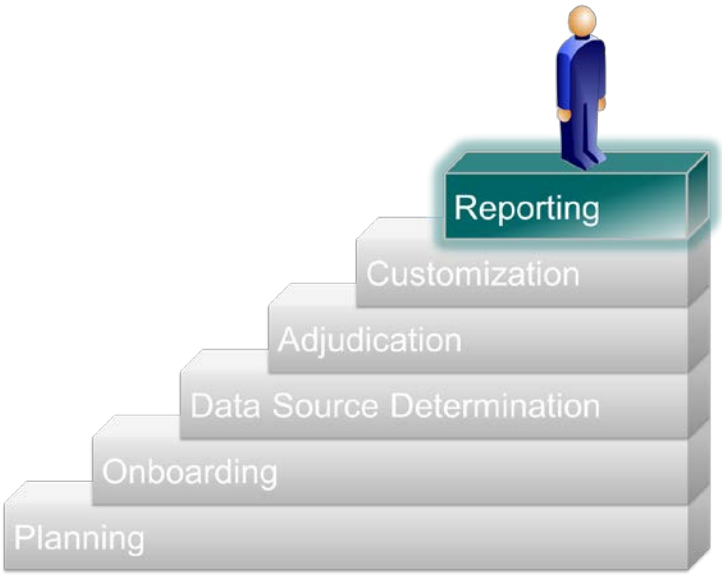
Table 20: Matching Customization Step 3 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Customize Treasury's Working System for approved business rules	Listing of approved business rules	Customized Treasury's Working System	Treasury's Working System customized for agency-specific business rules

3.7 Process Area 6: Reporting

The following sections provide an overview of the reporting process area, outline the roles and responsibilities of the parties, and describe the key activities involved.

3.7.1 Overview



The IPERIA legislation requires OMB to report to Congress annually on the effectiveness of the Do Not Pay Initiative. OMB has designated Treasury's Working System as the system for the implementation of the Do Not Pay Initiative.

Following are the annual reporting requirements from the IPERIA legislation:

> *The Director of the Office of Management and Budget shall submit to Congress an annual report, which may be included as part of another report submitted to Congress by the Director, regarding the operation of the Do Not Pay Initiative, which shall — (A) include an evaluation of whether the Do Not Pay Initiative has reduced improper payments or improper awards; and (B) provide the frequency of corrections or identification of incorrect information.*

You will build on the information that your agency has currently documented in its A-123 process documentation and OMB A-136 reporting.

The objectives of the reporting process are to:

- Evaluate if the Do Not Pay Initiative has reduced improper payments
- Provide OMB and Congress an update on the frequency of corrections or identification of incorrect information

3.7.2 Roles and Responsibilities

Table 21 identifies the roles and responsibilities that must be in place to ensure success of the reporting process.

Table 21: Reporting Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Builds on information captured through the A-123 process • Reports to OMB in the annual reporting process, as outlined in A-136
OMB	• Summarizes information from agency reports related to the agency's implementation of the Do Not Pay Initiative , and reports the information to Congress

3.7.3 Key Activities

This section defines the reporting process and includes the roles performed by you, Treasury, and OMB. This process begins with your review of your agency work related to the OMB Circular A-123 results, along with your experience with Treasury's Working System. You will then look at the annual reporting requirements outlined in OMB Circular A-136. The process ends with compiling data related to your agency's implementation of the Do Not Pay Initiative and Treasury's Working System to report to OMB. **Figure 18** provides an overview of the major steps you will perform during the reporting process.

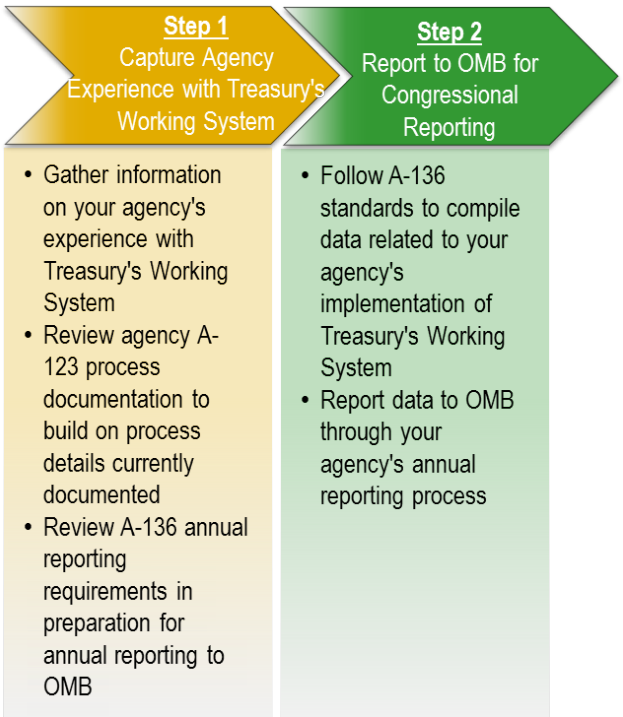


Figure 18: Reporting Process Steps

Step 1: Capture Agency Experience with Treasury's Working System

In this stage, you should build on the work that you have done through the OMB A-123 process. In addition, you will need to summarize your experience with Treasury's Working System and report this information to OMB, as directed by the annual

reporting guidance set forth in A-136.

Step 2: Report to OMB for Congressional Reporting

Once you compile required data related to your implementation of IPERIA and Treasury's Working System, you will send the information to OMB to consolidate for governmentwide reporting. **Figure 19** depicts the reporting process.

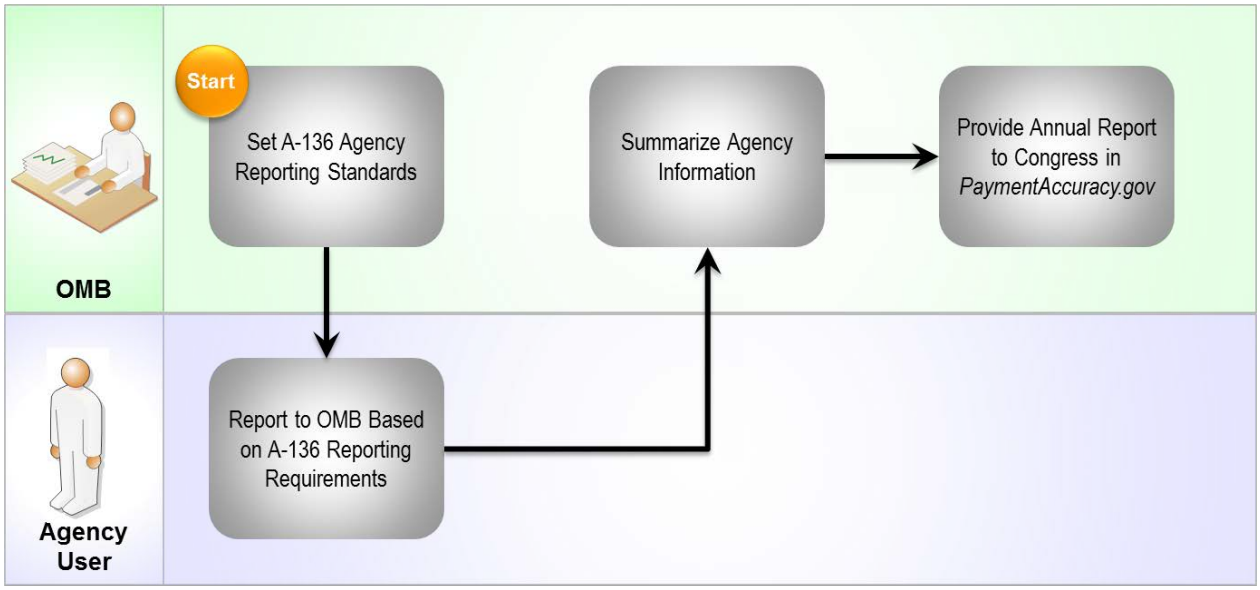


Figure 19: Annual Reporting Process Details

Table 22 summarizes the key activities, inputs/outputs, and expected outcomes of the reporting process.

Table 22: Reporting – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Capture information related to your experience with Treasury's Working System	Experience using Treasury's Working System	Results from using Treasury's Working System	Evaluation of success of using Treasury's Working System
Report to OMB on the Do Not Pay Initiative	Results from using Treasury's Working System Other information as appropriate on preventing improper payments	Report to OMB following guidance in A-136	OMB will have data needed to complete annual Report to Congress

Section 4: Payment Integration

The following sections provide an overview of the payment integration, outline the roles and responsibilities of the parties, and describe the key activities involved.

4.1 Overview

Payment integration is the process that Treasury is using to ensure that it matches payments that it issues against Treasury's Working System. It then forwards the resultant matches back to you for adjudication and final disposition. For most agencies, this process of matching the files and sending the results to you will occur without you taking any particular action. The payment files used are your payment records that Treasury has collected throughout the payment process.

Treasury is in a unique position to help support you in reducing improper payments. For most agencies, Treasury is the last stop before releasing a payment to the public. In that role, Treasury can serve as the final check before making a payment. This unique position in the payment stream also provides the potential of Treasury actually stopping a payment before releasing it. This is a capability that will be available to you in Release 3.0 of Treasury's Working System.

The objective of the payment integration process is to match all payment files against the data sources identified in the IPERIA legislation.

4.2 Roles and Responsibilities

Table 23 identifies the roles and responsibilities that must be in place to ensure success of the payment integration process.

Table 23: Payment Integration Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Receives matches from Treasury, and conducts research through adjudication process
Treasury	• Matches payment files to data sources and provide reports back to agencies

4.3 Key Activities

4.3.1 Payment Integration

Treasury is implementing payment integration in phases, as depicted in **Figure 20.** NTDO agencies will follow a different process to integrate into the payment stream. We describe the NTDO process further in **Section 4.3.2 Non-Treasury Disbursing Officer Payment Integration Process.**

During payment integration, Treasury's Working System matches your payment files against the data sources. It returns the resulting matches to you for adjudication and resolution. Payment integration is an evolving process. Below is a description of the payment integration process.

Treasury's Working System is implementing a three-tiered payment integration process:

- **Phase 1 (Implemented):** Treasury provides payment matching information to you, using the PACER file. In this phase, Treasury matches your payment files against Treasury's Working System payments, and it turns over the resultant matches to you for adjudication.

- **Phase 2 (Implemented):** Treasury provides payment information to you, using payment files submitted through PAM, and the subsequent matches are viewable in Treasury's Working System on PAM or the Do Not Pay Portal. Treasury is implementing this capability as each agency converts to the PAM system. If agencies have not yet converted to PAM, Treasury will continue to use the PACER file and send results via e-mail.

- **Phase 3 (Implemented):** Treasury provides the ability to stop or flag payments, in real-time, deemed improper before it issues them, based on your stop-payment rules. You will need to provide Treasury with the stop-payment rules that you will want Treasury to use to stop or flag a payment. This is an excellent method to ensure that there is one final check before payment. It is at this point as well that you have the capability to whitelist entities to prevent the same entity from falsely matching in subsequent files.

Figure 20 outlines the phases implemented for the payment integration process.

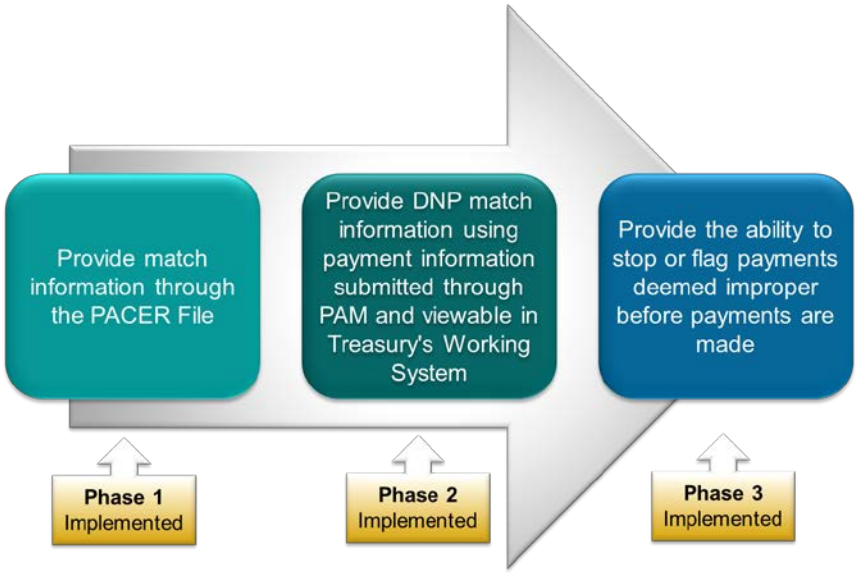


Figure 20: Payment Integration Approach

In addition, Phase 3 of this integrated approach allows you to adjudicate more proactively through Treasury's Working System. As you acclimate to Treasury's Working System, Treasury engages you in discussions to optimize and streamline the payment-stream integration process.

Refer to **Section 3.5 Process Area 4: Adjudication** for more information regarding the adjudication process. Refer to **Section 3.6 Process Area 6: Customization** for more information about optimizing the matching process. Further discussions on the payment integration process may include, but not be limited to:

- Identifying your business rules;
- Strategizing on how to reduce the number of payment-file "false-positive" matches;
- Understanding payment-file structure and using all data fields on the payment file that can help to match records more conclusively;
- Identifying authoritative personnel to combat improper-payments issues/concerns; and
- Identifying stop-payment rules for those payments that you may want stopped or flagged.

Although matches in payment integration currently occur after making the payment, these matches can be helpful in improving the matching process going forward. You will be able to use the information obtained from the payment integration matches to adjust your own internal processes and minimize future false positive matches. This process also helps to highlight issues on the payment files that may be hindering matches. Once Treasury implements you into the PAM payment process, you will be doing your matches in almost real time with the payment process; you can also set stop-payment rules that can actually stop release of payments. This provides you with a powerful tool that complements your own internal controls in stopping improper payments.

Table 24 summarizes the key activities, inputs/outputs, and expected outcomes of the Treasury Disbursing Officer (TDO) Payment Integration.

Table 24: TDO Payment Integration – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Submit your payment files to Treasury as usual	Payment file	Adjudication Reports	Adjudication Reports available for research

4.3.2 Non-Treasury Disbursing Officer Payment Integration Process

The following section provides an overview of the payment integration process for those agencies that issue their payments through an NTDO.

4.3.2.1 Overview

Some agencies issue some or all of their payments through an NTDO. Only agencies that issue their payments through a TDO will automatically have their payment files matched against the approved databases in Treasury's Working System. If your agency issues your payments through an NTDO, then it will be necessary for you to take additional steps to be sure that Treasury's

Working System matches your payment files against its approved databases. This section will discuss the additional steps you will need to take to ensure that Treasury's Working System properly matches your payment files and that you maintain the correct information concerning these matches.

4.3.2.2 Roles and Responsibilities

Table 25 summarizes roles and responsibilities for agencies that use NTDOs to issue their payments.

Table 25: NTDO Payment Integration Roles and Responsibilities

Entities	Roles/Responsibilities
Agencies that use NTDOs	• Ensure that all payment files are matched against Treasury's Working System before payment • Maintain statistics on the results of your matches
Treasury	• Matches files from agencies that use NTDOs, and returns results timely

4.3.2.3 Key Activities

If you use an NTDO to issue some or all of your payments, you will need to take additional steps to ensure that Treasury's Working System matches all of your payments before issuance of the payments. This will require you to look at your payment process and to determine at what point you will be able to provide a file to Treasury for it to identify the matches and return the results to you.

Table 26 summarizes the key activities, inputs/outputs, and expected outcomes for the NTDO payment integration process.

Table 26: NTDO Payment Integration Process – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Determine whether your agency uses NTDOs to issue any payments	Review of payment process	Determination whether you use NTDOs to issue any payments	Identification whether additional steps are needed for Payment Integration
Decide at which stage of payment process to provide payment file to Treasury's Working System	Review of payment process	Identification of point in payment process to send file to Treasury's Working System	Payment files sent to Treasury's Working System before payment

Section 5: Computer Matching Agreements

The following sections provide an overview of the CMA process, outline the roles and responsibilities of the parties, and describe the key activities involved.

5.1 Overview

A CMA is a written agreement between a payment-issuing agency and an original-source agency that allows the parties to engage in a matching program. The original-source agency would be one of those agencies that have one of the IPERIA mandated databases, such as SAM Exclusion Records. The payment-issuing agency is any agency that wants to match its files against one of the IPERIA mandated restricted databases. The CMA establishes the conditions, safeguards, and procedures under which agencies agree to disclose data where there is a computerized comparison of two or more automated Systems of Records (SORs).

You need CMAs to enter into matching programs with information subject to the Privacy Act. **Specifically, if your file includes information about living individuals, a CMA with Treasury may be required to match against most of the restricted files in Treasury's Working System.** The CMA process in this section covers the requirements set forth in the Privacy Act and highlights the guidance that OMB provides in Memorandum (M)-13-20.

The CMA process outlines the basic steps needed to complete a CMA. Completion of the CMA will allow you to perform electronic matches with key data sources while ensuring that you maintain the privacy rights of individuals. Matching to files that require CMAs is one step that you can undertake that can significantly decrease the number of false positives that can occur when matching with the corresponding "public" version of the same basic data. This can be critical to a more-timely reduction in the number of improper payments that occur at your agency.

The objectives of the CMA process are to:

- Establish a CMA based on requirements to access data subject to the Privacy Act; and
- Maintain the privacy, protection, and due process rights of individuals while matching against Treasury's Working System.

5.2 Roles and Responsibilities

Table 27 identifies the roles and responsibilities that must be in place to ensure success of the CMA process.

Table 27: CMA Process Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Reviews process, and determines whether CMA is required • If required, works with Treasury to fill out the CMA template • Completes legal review, and obtains Data Integrity Board (DIB) approval • Publishes notice in *Federal Register*
Treasury	• Works with payment-issuing agencies to determine whether a CMA is required • If required, fills out CMA template with agency Completes legal review, and obtains Treasury DIB approval

5.3 Key Activities

This section defines the CMA process and includes the roles performed by both you and Treasury. This process begins with determining the need for a CMA. The process ends with obtaining approval for the CMA and publishing the notice in the *Federal Register*. **Figure 21** provides an overview of the major steps you will perform during the CMA process.

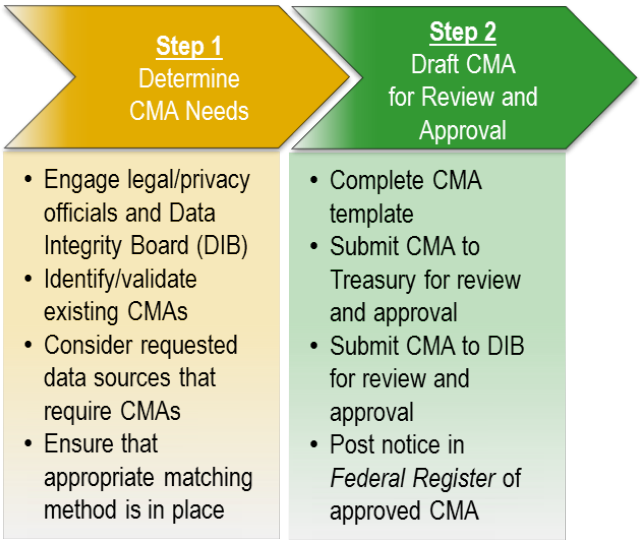


Figure 21: CMA Process Steps

Step 1: Determine CMA Needs

As you begin the CMA process, you must engage your agency's legal/privacy officials and DIB to properly address the privacy requirements. You must be aware of any CMAs that your agency may have already established. For existing CMAs, you must determine whether any of these agreements relate to the available data sources in Treasury's Working System. You must also determine whether there are other data sources in Treasury's Working System for which a CMA is required. Treasury will be able to assist you as you consider your options.

When determining whether you will be matching against data records that will require a CMA, you must consider the method that you plan to use to match to the data records. You must determine your method for data matching during the planning process, along with other planning activities outlined in **Section 3.2 Process Area: Planning**. For instance, online single search requests will not require a CMA. However, the other methods of matching, such as batch matching, continuous monitoring, or payment integration, may require a CMA. It will depend on the nature of the data source that you want to match. If the data source is subject to the Privacy Act, then it requires a CMA.

As you evaluate the data files that you want to match against, you should also consider that some of the best data sources may require a CMA. The reason that some of these data sources are the best data sources is because they contain data elements such as SSN. Matching against SSNs can provide you with a more conclusive match than just matching on a person's name. Without unique identifiers such as SSN, batch matches can result in more matches that are not correct matches, commonly referred to as "false positives." False positive matches can be time consuming for you to research and resolve.

Treasury will work with you to help you determine whether a CMA is required.

Table 28 summarizes the key activities, inputs/outputs, and expected outcomes for the CMA process.

Table 28: CMA Process Step 1 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activity	Input	Output	Expected Outcome
Determine whether you will be matching to files that require a CMA	Review of available data sources	Completed review of available data sources	Decision on need for CMA

Step 2: Draft CMA for Review and Approval

Treasury has worked to streamline the CMA process by creating a standard CMA template for agency use. In addition, Treasury conducts training to help agencies work through this process. You also have access to Treasury for continuous advice and support.

When considering the CMA process, some idea of the timeframe involved should help as you consider your implementation. Once you draft your CMA, the CMA must undergo a series of reviews for approval. Once approved, you must post a notice of the approved CMA in the *Federal Register*. The end-to-end CMA review-and-approval process takes approximately 17.5 weeks to complete. **Figure 22** provides a high-level depiction of the required actions and estimated timeframe involved.

Time Frame (Estimates)	Actions
1 week	Draft CMA for Treasury's internal review
2 weeks	Treasury's legal review and approval
2 weeks	Payment-issuing agency review
8.5 weeks	Payment-issuing agency and Treasury DIBs review and approval
4 weeks	Payment-issuing agency posts notice in *Federal Register* of approved CMA
TOTAL: 17.5 weeks (~4 months)	Matches commence, pending successful onboarding of payment-issuing agency to Treasury's Working System

Figure 22: CMA Process Time Frame Estimates

Figure 23: CMA Process

Table 29 summarizes the key activities, inputs/outputs, and expected outcomes for the CMA process.

Table 29: CMA Process Step 2 – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Complete CMA using Treasury template	Treasury CMA template	CMA drafted	CMA ready for review
Legal and Data Integrity Board reviews at Payment-Issuing Agency and Treasury	Completed CMA	Completed review	Approved or rejected CMA

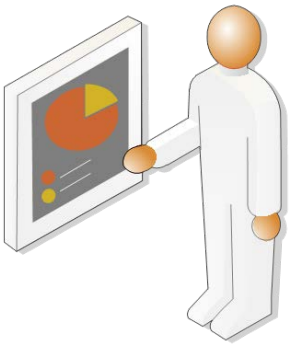
Key Activities	Inputs	Outputs	Expected Outcomes
Payment-Issuing Agency posts notice in *Federal Register*	Approved CMA	Notice in *Federal Register*	Matching process can begin after 30 days

Section 6: Analytics Services

The following sections provide an overview of the Analytics Services, outline the roles and responsibilities of the parties, and describe the key activities involved.

6.1 Overview

The analytics capabilities at Treasury can help you to maximize your use of Treasury's Working System.



Treasury's analytics services can provide you with support to help you do further analysis of your data., Treasury recognizes analytics as a more dynamic service in comparison to some of the Portal service offerings and can work with you at each stage of implementation to maximize your use of the system. As you become more familiar with Treasury's Working System, you may want to consider the analytic capabilities available through analytics services. Examples include identifying trends, patterns, or systemic causes of improper payments. These services can help you fully implement Treasury's Working System and take advantage of everything that is available to you.

6.2 Roles and Responsibilities

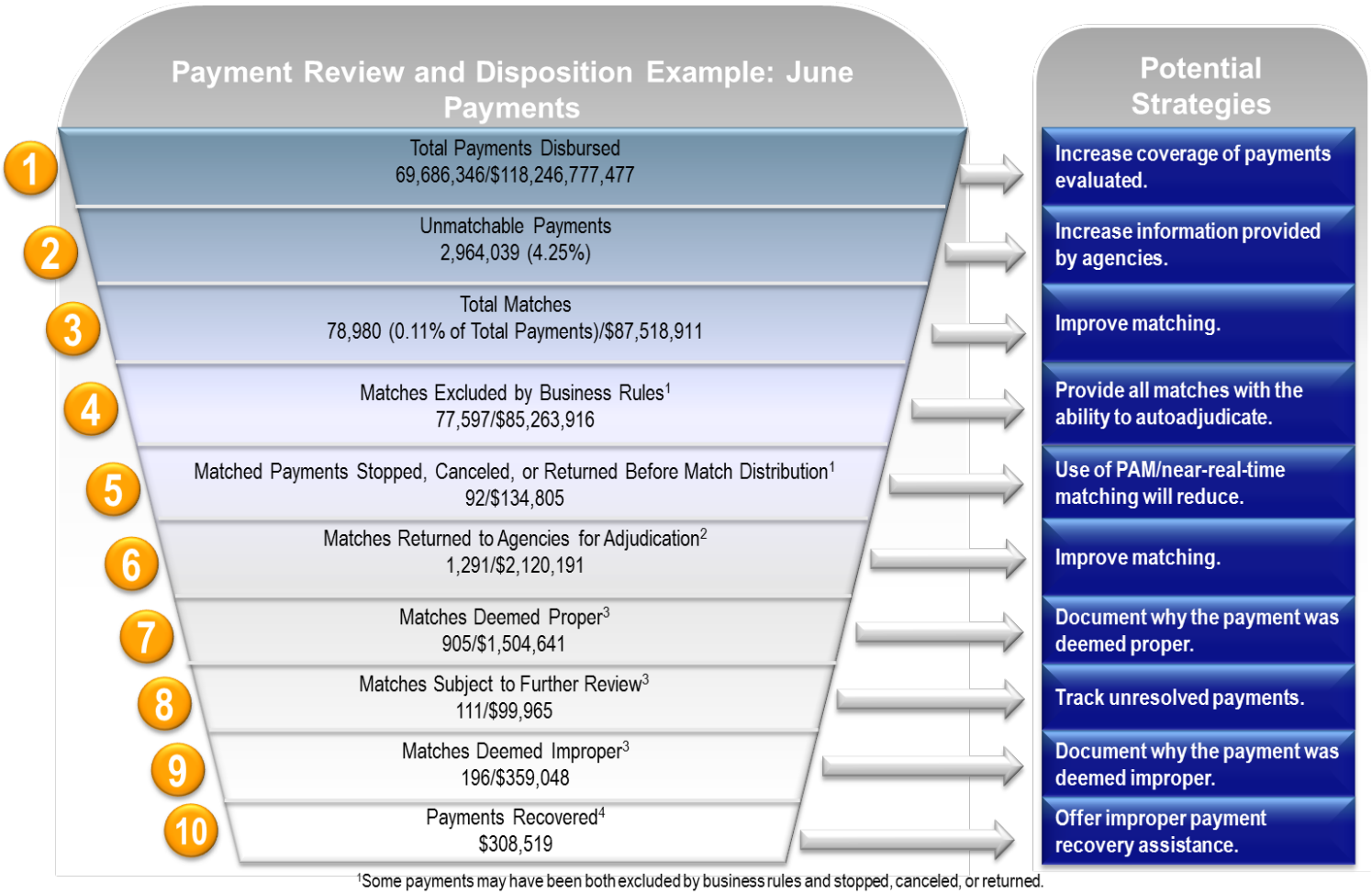
This section provides a detailed discussion of the roles and responsibilities for each entity for the analytics process. **Table 30** identifies the roles and responsibilities that must be in place to ensure success of the analytics process.

Table 30: Analytics Roles and Responsibilities

Entities	Roles/Responsibilities
Agency	• Reviews match results, and considers recommendations for maximizing its use of Treasury's Working System • Requests analytics services • Provides data sources needed for analysis
Treasury	• Supports agencies as they work to determine the type of analysis they want to conduct • Conducts analysis • Provides agency feedback/insight based on analysis

6.3 Key Activities

Based on our experiences to date, Treasury has set out strategies that can improve your use of Treasury's Working System and maximize the results. **Figure 24** will give you an overview of that analysis and should help you as you consider the things that you can do to improve your implementation.



[1]Some payments may have been both excluded by business rules and stopped, canceled, or returned.
[2]On Adjudication Reports, agencies reported receiving only 1,240 matches.
[3]Proper, Further Review, and Improper sum to only 1,212 matches.
[4]Some payments only partially recovered.

Figure 24: Payment Review Level and Potential Strategies

The following list provides a detailed description of each payment review level and the potential strategies for improvement at each level, as depicted in **Figure 24.** Each description will also include steps that you can take to maximize results at each level of payment review.

1. ***Total Payments Disbursed.*** Represents all of the payments that Treasury issued for that month. Treasury does not issue all government payments. In the example, Treasury issued and matched almost 70 million payments for the month used.

Potential Strategy #1
Increase coverage of payments evaluated. This strategy is for Treasury to issue more of the payments. For your agency, this could mean allowing Treasury to be the issuer of all of your payments. If Treasury issued all of your payments, it would be able to do these matches at any stage, but particularly right before payment. This will also allow you to actually have Treasury stop the payment once it implements that capability with Release 3.0 of Treasury's Working System.

2. ***Unmatchable Payments.*** Represents payments where there is missing taxpayer identification numbers, or alpha characters where there should be numbers, or numbers that are meaningless (like all 9s). In the example, Treasury was unable to match almost 3 million payments. Without proper information in the payment files, Treasury cannot effectively match these files against the data files.

Potential Strategy #2
Increase information provided by agencies. This strategy would ask that you work to improve your payment files to make sure that you provide complete information to Treasury. This will allow Treasury to properly match your payment files against the data sources.

3. ***Total Matches.*** Represents total matches for the month. In the example, there were almost 79,000 matches for this one month.

Potential Strategy #3
Improve matching. This strategy is to continue to strengthen the matching logic. It refers to how matches occur with name and TIN. Names can be slightly off (e.g., with "John" listed in one file and "J" listed in the other file).

4. ***Matches Excluded by Business Rules.*** Represents matches excluded because of agency business rules. In the example, Treasury excluded almost 78,000 matches because of agency business rules. This could happen when an agency has a business rule that says that it does not want to see death matches until the person is dead for 120 days. Some agencies have indicated that it takes that long for them to update their systems for deceased individuals.

Potential Strategy #4
Provide all matches with the ability to autoadjudicate. This strategy is for Treasury going forward to provide those matches to the agencies, but to have them categorized as matches excluded by an agency's business rules. The plan would be to allow the agency to autoadjudicate. It will be important for you to consider those matches that you have excluded because of business rules because your agency may have an issue that needs addressing, such as why it takes 60 days to post a person's death in your agency system.

5. ***Matched Payments Stopped, Canceled, or Returned Before Match Distribution.*** Represents payments that had these events happen to them between the time of issuance and the time that the match run occurred. In the example, 92 payments were stopped, canceled, or returned.

Potential Strategy #5
Use of PAM/near-real-time matching will reduce. This strategy indicates that going forward the use of PAM will eliminate these payments. The match will occur close to real time to eliminate a gap between time of match and time of payment.

6. ***Matches Returned to Agencies for Adjudication.*** Represents the matches that agencies would be reviewing to determine whether they are legitimate payments. In the example, Treasury sent 1,291 matches to the agencies for adjudication. Agencies would classify these into one of the following three matching categories: "proper," "needs further review," and "improper."

Potential Strategy #6
Improve matching. This strategy going forward is to improve the matching process. In addition, when Treasury received the Adjudication Reports back from the agencies on these matches, only 1,240 were sent back and classified into one of the three matching categories. Therefore, 51 were lost just in the back-and-forth process. With Release 3.0, you will do the Adjudication Report online, eliminating that problem.

7. ***Matches Deemed Proper.*** Represents matches that the agencies adjudicated as proper. In the example, the agency adjudicated 905 matches as "proper."

Potential Strategy #7
Document why the payment was deemed proper. This strategy indicates that going forward it will be important for you to document why these payments were determined to be "proper."

8. ***Matches Subject to Further Review.*** Represents matches for which the agencies have not completed their research. In the example, the agencies categorized 111 payments as "needs further review."

Potential Strategy #8
Track unresolved payments. This strategy indicates that going forward you would track the final resolution for these matches so that they do not get lost.

9. ***Matches Deemed Improper.*** Represents matches that agencies deemed "improper." In the example, the agencies deemed 195 payments as "improper."

Potential Strategy #9
Document why the payment was deemed improper. This strategy indicates that going forward you will need to document why these payments were deemed "improper."

10. ***Payments Recovered.*** Represents the total dollar value for payment recovery. In the example, agencies recovered more than $300,000 from erroneous payments.

Potential Strategy #10
Offer improper-payment recovery assistance. This strategy going forward is that Treasury can assist you in this recovery process.

In addition to the analytics services that Treasury offers to help maximize your use of Treasury's Working System, Treasury can also provide you with further analysis of your payment or other data files. Treasury offers you access to the analytics services group. As you become more familiar with Treasury's Working System, you may want to consider the analytic capabilities available through analytics services. These services offer customized analysis into your data that could point to fraud and suspicious activity. Treasury designed analytics services to provide unique insights into your data in ways that can highlight problems and allow you to take action to reduce waste, fraud, and abuse in your programs. Generally, the data analytic services would be an option that you would consider after you have completed your initial implementation of Treasury's Working System. These services are individualized services that you can arrange with Treasury.

If you decide to use the data analytic services offered by Treasury, then Treasury can assist you in considering what further analysis you may want to conduct to look at your data. Data analysis offers an insightful way for you to further analyze your data. You can use any data sources to do this type of analysis. Treasury currently has the payment data for most agencies, and it can use this data to show significant trends. Some of these trends could be an indication of further problems. Through performing analytics on your payment files or other files that you may provide, Treasury can identify trends, statistics, and indications of problem areas. Deep-dive analysis (described below) would allow you to take a detailed look into specified groups or individuals and compare against other data sources.

You can view and consider analytics in a variety of ways, including:

1. Statistical analysis,
2. Trending over time,
3. Deep-dive analysis, and
4. Ad hoc analysis.

Statistical Analysis

With statistical analysis, you inspect your data to review basic types of information. The limiting factor of what you will be able to see depends on what underlying data exists on the data file analyzed. Statistical analysis includes the following:

- Counts;
- Sums;

- Percentages;
- Maximum, minimum, mean, median, and mode;
- Distributions; and
- Charts and graphs.

Trending Over Time

With trending over time, you are studying what is happening to your data over a specific time period. This can show abnormalities. Payments that do not follow the normal pattern can be an indication of a problem. This is similar to the type of analysis done by a credit card company as it sees spending patterns that are not normal for its customer. If you would like to do this analysis on your data, then you should consider what trending patterns would be important for you to know. **Figure 25** identifies a simple example of trending information that you might consider.

Four-Month Trending Example				
Age	Month 1	Month 2	Month 3	Month 4
0 - 29	35	32	55*	30
30 - 59	50	51	49	48
60 - 100	100	101	103	99
100+	20	19	21	19
Total	**205**	**203**	**228**	**196**

*Trend change may indicate problem.

Figure 25: Four-Month Trending Example

Deep-Dive Analysis

Deep dive analysis is performed to conduct further research on specific groups, individuals, or entities, based on criteria that you establish. You may have noticed a pattern or issue that you would like to spend more time investigating. Using the example in **Figure 25**, you might want to consider why a spike occurred in numbers for ages 0–29 in the third month. Did something cause this spike? Do you have other data sources that you might review to determine why this happened? With this type of investigation, you can look at internal and external data sources to help you determine whether a problem exists. Treasury can help you as you consider the further analytics that you may want to use.

One agency used trending and deep dive analysis to help focus their on the ground resources for on-site visits and audits. Once they made this change, they saw a significant improvement in their successful fraud investigations.

Ad Hoc Analysis

Use ad hoc analysis when you want to investigate a particular pattern or problem area. This can happen in response to an event or issue. You may be receiving complaints through your customer support area that might indicate a problem that you would want to research further. Following is a list of the types of analysis that other agencies have done:

- Identifying payments or payees outside of the United States;
- Performing a payment-distribution analysis (by region, by age, by payment type, by payment amount, etc.);
- Identifying payments made to PO boxes or to a particular PO box;
- Identifying duplicate payments; and
- Identifying conflicting information, such as a unique identifier associated with two different names, the same name associated with more than one unique identifier, or a bank account shared by multiple TINs.

If you determine that you need to conduct additional data analysis, Treasury can assist you in setting up that analysis. Treasury's Working System is one method to support the reduction of improper payments. Analytics, combined with your own internal systems of control, can go further in assisting you to focus your resources and reduce improper payments.

Table 31 summarizes the key activities, inputs/outputs, and expected outcomes for analytics.

Table 31: Analytics – Summary of Key Activities, Inputs/Outputs, and Expected Outcomes

Key Activities	Inputs	Outputs	Expected Outcomes
Review results of Treasury analytics on payment files	Treasury analysis and recommendations	Decision on ways to improve implementation of Treasury's Working System	Improved use of Treasury's Working System
Determine whether your agency needs further analytics support	Discussions with Treasury on other analytics capabilities	Decision on other analytics services needed	Optimum use of analytics services

Appendix A: Glossary of Terms

The following table provides a list of terms and definitions.

Term	Definition
Agency Support Center	Team of subject matter experts known as Relationship Managers (RMs) who support agencies for both Treasury's Working System and the analytics services throughout the entire onboarding process.
Analytics Services	Team of data analysts at Treasury who help agencies identify trends, patterns, and risks that may be associated with fraud or systemic sources of improper payments and could warrant more investigation on the part of the payment-issuing agency.
Authorizing Official	Primary agency point of contact for matters relating to Treasury's Working System. Responsibilities include establishing the Access Group to determine the database it will need access to; determine how the Access Group will send and receive files; and grant agency users permission to use the application.
Batch Matching	An agency sends in files before or after it makes payments; Treasury matches the files to authorized, available data sources; and it returns the results to the user via Treasury's Working System.
Business Rule	Requirements and parameters that allow the agency to flag and/or mitigate matches on payments that might be proper based on agency policy or other conditions found to result in false-positive matches.
Computer Matching Agreement	Written agreement between an original-source agency and a payment-issuing agency (or multiple original-source and/or payment-issuing agencies, as appropriate) or a non-Federal agency that allows the parties to engage in a matching program. In Treasury's Working System matching program, original-source agencies need not be a party to a computer matching agreement between Treasury and a payment-issuing agency.
Continuous Monitoring	An agency sends in files of payees such as vendors, and Treasury's Working System stores the files and makes available within Treasury's Working System matches found against authorized, available data sources. This process occurs in an iterative/ongoing manner, not just in a one-time match.
Data Integrity Board	Board of senior personnel designated by the head of an agency that is responsible for reviewing the agency's proposals to conduct or participate in a matching program, and for conducting an annual review of all matching programs in which the agency has participated.
Do Not Pay Initiative	Initiative codified by Section 5 of IPERIA to facilitate Federal agencies' reviews of payment or award eligibility for purposes of identifying and preventing improper payments. The initiative may include other activities, as designated by OMB. This initiative includes Treasury's Working System.
False Positive	Payment flagged as a potential improper payment that, after review, is determined to be proper.

Term	Definition
Improper Payment	Payment that an agency should not have made or that it made in an incorrect amount under statutory, contractual, administrative, or other legally applicable requirements.
Matching Program	Computerized comparison of records from two or more automated systems of records, or of an automated system of records and automated records maintained by a non-Federal agency.
Matching Rule	Defines the matching strategy used for each agency or data source (e.g., TIN to TIN, TIN to Name).
Online Single Search	One single entry into Treasury's Working System to search and match to records in the databases. Returns entries that represent possible improper recipients of payments. Users can search on attributes such as Tax Identification Number (TIN), Employee Identification Number (EIN), Social Security Number (SSN), Data Universal Number System (DUNS), and Business or Individual Name.
Original-Source Agency	Agency that discloses records from a system of records to another agency to allow that agency to use the records in a matching program with a payment-issuing agency.
Payment-Issuing Agency	Agency that sends data-source files to Treasury's Working System to match.
Relationship Manager	Treasury's Working System personnel located at the Federal Reserve Bank. Represents Treasury as the primary point of contact for all agency questions and concerns.
Treasury's Working System	Matching program conducted for purposes of the Do Not Pay Initiative and involving at least one of the six databases enumerated in Section 5(a) (2) of IPERIA, as amended, and/or a database designated by OMB. Treasury's Working System matching programs are subject to alternative standards and procedures that are different from the standards and procedures that apply to matching programs outside of the Do Not Pay Initiative.
Treasury's Working System Portal	Web-based single-entry access point that Federal agencies can use to gain access to an array of data sources to assist in determining whether an individual or entity matches one of the key databases. Agencies may use this information as a factor in determining eligibility for this individual or entity to receive Federal payments or engage in Federal contracts.

Appendix B: List of Acronyms

Acronym	Definition
ALC	Agency Location Code
ASAP	Automated Standard Application for Payments
CAIVRS	Credit Alert Interactive Voice Response System
CFO	Chief Financial Officer
CMA	Computer Matching Agreement
DIB	Data Integrity Board
DMF	Death Master File
DNP	Do Not Pay
DUNS	Data Universal Numbering System
EIN	Employee Identification Number
EPLS	Excluded Parties List System
FMS	Financial Management Service (*now known as the Bureau of the Fiscal Service*)
GAO	Government Accountability Office
GSA	General Services Administration
IPERA	Improper Payments Elimination and Recovery Act
IPERIA	Improper Payments Elimination and Recovery Improvement Act
IPIA	Improper Payments Information Act of 2002
IPP	Invoice Processing Platform
ITIM	IBM Tivoli Identity Manager
ITS	International Treasury Services
LEIE	List of Excluded Individuals and Entities
MOU	Memorandum of Understanding
NTDO	Non-Treasury Disbursing Office
OCFO	Office of Chief Financial Officer
OIG	Office of Inspector General
OMB	Office of Management and Budget
PACER	Payments, Claims and Enhanced Reconciliation
PAM	Payment Application Modernization
PKI	Public Key Infrastructure
PUPS	Prisoner Update Processing System
RM	Relationship Manager
RSDI	Retirement, Survivors, or Disability Insurance
SAM	System for Award Management
SOR	System of Records
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
TDO	Treasury Disbursing Officer
TOP	Treasury Offset Program
TIN	Taxpayer Identification Number
U.S.C.	United States Code

Appendix C: Frequently Asked Questions

The following list includes frequently asked questions regarding the Do Not Pay Program. A more comprehensive list of FAQs for generic questions appears at http://donotpay.treas.gov/FAQs.htm.

1. **What is Do Not Pay?**
2. **How will the Do Not Pay Business Center help my agency reduce improper payments?**
3. **How will my agency benefit from using Treasury's Working System?**
4. **Under what authority is Do Not Pay mandated?**
5. **Can individuals not associated with a government agency access Treasury's Working System?**
6. **What information do I need to be able to conduct a search in Treasury's Working System?**
7. **What is the difference between the online, batch, and continuous monitoring methods of submission?**
8. **Do you have to search on all of the databases, or can you select a specific database?**
9. **How often is the data in Treasury's Working System updated?**
10. **What happens if the search returns information the customer considers incorrect?**
11. **Whom can I contact if I need assistance with Treasury's Working System?**
12. **How can an agency request/suggest an enhancement to the program?**
13. **What is a Computer Matching Agreement (CMA)?**
14. **Why do I need a Computer Matching Agreement?**

Questions and Answers
1. What is Do Not Pay?
Do Not Pay is a one-stop shop that allows agencies to check various databases before making payments or awards to identify ineligible recipients and prevent fraud or errors from being made. The Do Not Pay functions occur in Treasury's Working System.
2. How will the Do Not Pay Business Center help my agency reduce improper payments?
Treasury developed the Do Not Pay Business Center, now referred to as Treasury's Working System, as directed by an Executive Memorandum on June 18, 2010, to support Federal agencies in their efforts to reduce the number of improper payments made through programs funded by the Federal Government. Treasury's Working System will provide automated tools, including a Web-based single-entry access portal, which Federal agencies can use to gain access to an array of data sources to assist in determining whether an individual or company is eligible to receive Federal payments or engage in Federal contracts.
3. How will my agency benefit from using Treasury's Working System?
Treasury's Working System will benefit any agency that enters into a financial transaction with a person or entity. Simply stated, the overall goal for Treasury's Working System initiative is two-fold: to help agencies achieve the Administration's goal of reducing improper payments, while also safeguarding the privacy of individuals. Treasury's Working System will help reduce the number of improper payments by providing agencies streamlined access to relevant databases when evaluating eligibility for a payment, as well as before making a payment.
4. Under what authority is Do Not Pay mandated?
The Do Not Pay Program falls under the legislation of the Improper Payment Elimination Recovery Improvement Act (IPERIA) of 2012, which improves upon the Improper Payments Elimination and Recovery Act (IPERA) of 2010. IPERIA codifies the ongoing efforts to develop and enhance the Do Not Pay Initiative, requires Federal agencies to use the Do Not Pay List, as appropriate, and provides Federal agencies with additional tools to assist in the prevention of improper payments.
5. Can individuals not associated with a government agency access Treasury's Working System?
No, only individuals associated with a Federal agency will be able to enroll in Treasury's Working System.
6. What information do I need to be able to conduct a search in Treasury's Working System?
To conduct a search in Treasury's Working System, an individual would enter data-source combinations into Treasury's Working System search criteria.
7. What is the difference between the online, batch, and continuous monitoring methods of submission?
Online capabilities provide for searching a single name or entity. **Batch processing** allows users to compare a large number of records against all available sources at one time. **Continuous monitoring** allows an agency to perform ongoing comparisons against selected data sources. For example, an agency may supply a file to Treasury's Working System that it will compare with the appropriate data sources any time the data sources are refreshed. This eliminates the need to repeatedly send in the same file to Treasury's Working System and allows an agency to have the most up-to-date matches against its file. Any time someone updates the data source or agency file, a comparison occurs, and the results are available in the portal.

Questions and Answers
8. Do you have to search on all of the databases, or can you select a specific database?
When you enter information or run a batch job, Treasury's Working System performs a search on all of the databases to which you have received access. There is not a function to allow you to modify the databases your agency searches against.
9. How often is the data in Treasury's Working System updated?
Data sources are updated in different intervals, depending on how often the original-source agency updates its files. Contact 1-855-Verify-1 (1-855-837-4391) if you have a question about a particular data source.
10. What happens if the search returns information the customer considers incorrect?
Contact 1-855-837-4391. They will assist you in getting in touch with the appropriate agency to correct the problem.
11. Whom can I contact if I need assistance with Treasury's Working System?
Phone: 1-855-837-4391 Email: donotpay@stls.frb.org Fax: 1-866-707-6575 Mail: Do Not Pay Support Center Federal Reserve Bank of St. Louis PO Box 442 St. Louis, MO 63166
12. How can an agency request/suggest an enhancement to the program?
Treasury welcomes all comments and suggestions. Please send them to donotpay@stls.frb.org.
13. What is a Computer Matching Agreement (CMA)?
A CMA is a written agreement that establishes the conditions, safeguards, and procedures under which a Federal agency agrees to disclose data where there is a computerized comparison of two or more automated Systems of Records (SORs).
14. Why do I need a Computer Matching Agreement?
The Privacy Act of 1974 requires that Federal agencies enter into computer matching agreements when (with some exceptions) an agency intends to conduct a computerized comparison of two or more automated Federal systems of records. The purpose of the computerized comparison is to establish or verify the eligibility of, or continue compliance with statutory and regulatory requirements by: • Applicants for, • Recipients or beneficiaries of, • Participants in, or • Providers of services with respect to: • Cash or in-kind assistance or payments under Federal benefit programs.

Appendix D: Key Stakeholder Roles and Responsibilities

The following table defines Treasury's Working System key stakeholders, roles, and responsibilities.

Entity	Role	Responsibilities
Office of Management and Budget	• Promulgate policy/guidance	• Establishing government wide guidance related to improper payments, including requirements for implementing IPERIA • Implementing the Do Not Pay Initiative and providing guidance, oversight, and continued assistance to agencies • Establishing a working system for prepayment and preaward review as part of the Do Not Pay Initiative • Engaging senior Federal agency leadership, as needed, to ensure government wide compliance with Federal laws related to improper payments and key legislation/guidance • Supporting the Fiscal Service's efforts to acquire appropriate data sources for Treasury's Working System • Coordinating government wide efforts to develop and submit legislative proposals related to improper payments and Do Not Pay efforts
Treasury, Bureau of the Fiscal Service	• Facilitate agency compliance • Conduct related analytical activities	• Hosting a working system (Treasury's Working System) for the Do Not Pay Initiative that includes a system of records for Do Not Pay that allows agencies to perform prepayment eligibility reviews, as required by IPERIA • Developing Memoranda of Understanding (MOUs) with original-source agencies and periodically reviewing to determine whether the terms are sufficient • Entering into Computer Matching Agreements (CMAs) with appropriate payment-issuing agencies • Maintaining the central Do Not Pay Initiative website that includes all relevant information, including all relevant CMAs, system of record notices, and privacy impact assessments • Ensuring compliance with all applicable requirements in OMB M-13-20 and other applicable laws, regulations, and policies, as well as with the terms of all relevant CMAs and MOUs • Providing agencies with additional customized analysis to combat improper payments, including matching and analyzing the agency's payment file against currently available data sources to analyze the payment file for irregularities such as same unique identifier (Taxpayer Identification Number, Social Security Number, Employee Identification Number, DUNS, etc.) and different names • Supporting users for both services and all aspects of the process • Providing training and portal demonstrations

Entity	Role	Responsibilities
Original-Source Agencies	• Provide access to records according to applicable laws, regulations, and policies	• Ensuring that they have sufficient legal authority before disclosing records to Treasury for Treasury's Working System • Entering into a written MOU with Treasury that describes how Treasury may use the records in question and provides rules for protecting and correcting the information and for the retention and destruction of records • Confirming that Treasury has the appropriate level of security controls before sharing any records with Treasury • Coordinating with Treasury to develop a process that allows individuals to request the correction of data, and promptly reviewing any request for correction • Complying with all applicable requirements in IPERIA, OMB M-13-20, and other applicable laws, regulations, and policies, as well as with the terms of all relevant MOUs
Payment-Issuing Agencies	• Apply agency-specific business rules to increase the accuracy of the Treasury's Working System • Report improper payment findings to Treasury and OMB	• Ensuring that they have sufficient legal authority to engage in a matching program of Treasury's Working System • Entering into CMAs with Treasury • Conducting the cost-benefit analysis and meeting the reporting and publication requirements in the matching provisions of OMB M-13-20 • Ensuring that they match against only data sources that are relevant and necessary for the specific matching purpose • Making determinations about the disbursement of payments or awards, consistent with legal authority • Complying with all applicable laws, regulations, and policies

Government Oversight Bodies
• Government Accountability Office (GAO)
• OIGs
	• Conduct audits and report on agency compliance	• Conducting audits, evaluations, and investigations to identify fraud, waste, and abuse surrounding agencies' improper payments policies and procedures
		• Reporting on agency compliance with Do Not Pay legislation, including, but not limited to:
		  o IPERIA
		  o OMB M-13-20

Appendix E: Key Related Legislation, Regulations and Guidance

The following table includes a list of key promulgations (legislation, regulations, guidance, etc.) related to the Do Not Pay Program.

Promulgation	Description	Link
Improper Payments Elimination and Recovery Improvement Act of 2012, Public Law 112-248 (IPERIA)	Enhances the Administration's efforts to combat improper payments by establishing a Do Not Pay Initiative. Objective of the Do Not Pay Initiative is to provide timely, accurate, and actionable information and analysis to Federally funded programs and law enforcement to support the prevention, reduction, and recovery of improper payments.	http://www.gpo.gov/fdsys/pkg/PLAW-112publ248/pdf/PLAW-112publ248.pdf
Improper Payments Elimination and Recovery Act of 2010 (IPERA)	Retains the core provisions of the IPIA while requiring improvements in agency improper payment estimation methodologies and improper payment reduction plans. It also significantly expands the scope and reporting requirements of recovery audit programs.	http://www.gpo.gov/fdsys/pkg/PLAW-111publ204/pdf/PLAW-111publ204.pdf
Executive Order 13520 – Reducing Improper Payments and Eliminating Waste in Federal Programs	Adopts a comprehensive set of policies, including transparency and public scrutiny of significant payment errors through the Federal Government; a focus on identifying and eliminating the highest improper payments; accountability for reducing improper payments among executive branch agencies and officials; and coordinated Federal, state, and local government action in identifying and eliminating improper payments.[12]	http://www.whitehouse.gov/the-press-office/executive-order-reducing-improper-payments
Improper Payments Information Act of 2002 (IPIA)	Establishes an initial framework for identifying, measuring, preventing, and reporting on improper payments at each agency.	http://www.gpo.gov/fdsys/pkg/PLAW-107publ300/pdf/PLAW-107publ300.pdf
Recovery Auditing Act (Section 831 of the 2002 National Defense Authorization Act)	Legislation passed by Congress that requires agencies that award more than $500 million annually in contracts to establish programs to recover overpayments to contractors.	http://www.gpo.gov/fdsys/pkg/PLAW-107publ107/pdf/PLAW-107publ107.pdf

[12] Executive Order 13520 of November 20, 2009 (74 Fed. Reg. 62201; November 25, 2009).

Promulgation	Description	Link
Presidential Memorandum – Enhancing Payment Accuracy Through a "Do Not Pay List"	Memo for the heads of executive departments and agencies directing their agencies to review current prepayment and preaward procedures to ensure thorough review of all available eligibility databases.	http://www.whitehouse.gov/the-press-office/presidential-memorandum-enhancing-payment-accuracy-through-a-do-not-pay-list
OMB Circular A-123, Appendix C (*Requirements for Effective Measurement and Remediation of Improper Payments)*	Defines management's responsibility for internal control in Federal agencies. Specifically, defines governmentwide guidance on the implementation of IPERA.	http://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a123/a123_appx-c.pdf
Treasury Financial Manual, Volume I, Part 4, Chapter 2100	Describes procedures for publication of improper-payments data and related information on the PaymentAccuracy.gov website.	http://tfm.fiscal.treasury.gov/v1/p4/c210.pdf
OMB M-13-20	Implements section 5 of IPERIA and provide guidance to help Federal agencies protect privacy while reducing improper payments with the Do Not Pay Initiative.	http://www.whitehouse.gov/sites/default/files/omb/memoranda/2013/m-13-20.pdf
OMB Memorandum M-12-11, *Reducing Improper Payments through the "Do Not Pay List"*	Directs each agency to develop draft and final agency plans for using the Do Not Pay centralized solutions for prepayment eligibility reviews.	http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-11_1.pdf
OMB Memorandum M-11-04, *Increasing Efforts to Recapture Improper Payments by Intensifying and Expanding Payment Recapture Audits*	Issues interim guidance for agencies on intensifying and expanding payment-recapture audit reviews.	http://www.whitehouse.gov/sites/default/files/omb/memoranda/2011/m11-04.pdf

Appendix F: Templates and Forms

The following table provides a list of templates and forms for the Treasury's Working System.

Form/Template	Purpose	Pg#	External Link
Adjudication Report Template	Used to report monthly matches identified by number and dollar value of payments.	75	*Available on DNP OMB MAX site.*
File Association Form	Establishes the rules of connection between the agency and Treasury's Working System. **Please complete a new form for each file your agency will be submitting.**	76	*Available on DNP OMB MAX site.*
Individual User Enrollment Form	Designed to enroll agency users in Treasury's Working System and establish an ITIM account. Agency users complete the form and obtain the Authorizing Official's signature. They should then return the form to the Agency Outreach Team.	77	*Available on DNP OMB MAX site.*
Access Group Form	Establishes the Access Group and Authorizing Official for Treasury's Working System. The Access Group plans to use Treasury's Working System as its service provider to assist in the prevention of improper payments. **The Authorizing Official must complete this form.**	78	*Available on DNP OMB MAX site.*
Initial Questions Document	Designed to collect essential information for legal consideration from an agency onboarding Treasury's Working System.	79	*Available on DNP OMB MAX site.*
PKI Certification Action Request Form	Provisions the agency user(s) to establish credentials for obtaining a Treasury-issued PKI token. Agency user(s) already possessing Treasury-issued PKI tokens (e.g., acquired from other Treasury applications) may not need to complete this form.	80	*Available on DNP OMB MAX site.*

Appendix G: Treasury's Working System Database Sources

The following table provides the current list of Do Not Pay database sources.

Database	Owner	Description
Death Master File	Social Security Administration	A listing of deaths that been reported to the Social Security Administration. To ensure that death information received from the Death Master File in Treasury's Working System is accurate, each agency should verify the death results received from the Treasury's Working System against a secondary data source.
System for Award Management – Exclusion Records - Excluded Parties List System	General Services Administration	Individuals and firms excluded from receiving new Federal awards, including contracts, grants, and other financial assistance; and individuals and companies owned or controlled by targeted countries.
TOP Debt Check Database	Department of the Treasury	Delinquent child support and non-tax debt owed to the Federal Government.
List of Excluded Individuals/Entities	Department of Health and Human Services	Individuals and entities currently excluded from participation in Federal healthcare programs, such as Medicare and Medicaid.
Credit Alert Interactive Voice Response System	Department of Housing and Urban Development	Delinquent Federal debt information on outstanding loans, loans in default, or judgments for debts incurred with the following agencies: • Department of Housing and Urban Development • Department of Veterans Affairs • Department of Education • Department of Agriculture • Department of Justice • Small Business Administration
Prisoner Update Processing System (PUPS)	Social Security Administration	Individuals reported to the Social Security Administration, under Privacy Act computer matching agreements as well as certain informal reporting arrangements, as confined in certain institutions.

Appendix H: Release 3.0 Functionality

1. **Phase 3 of the Integration with PAM** – Treasury incorporated into the payment integration processes the ability to flag and/or stop payments, using stop-payment rules provided by the agency making the payment.
2. **Delta processing for Continuous Monitoring Agency or Data Source Files** – Provide s agencies subscribed to Continuous Monitoring the option to review all matches or only new, amended or deleted matches when a new **agency file** or **data source** file is received.
3. **Data Retention** – Maintains records in accordance with the Do Not Pay (DNP) Privacy Act System of Records Notice (SORN) in support of agency adjudication, reporting, and analytics activities applicable to this release.
4. **Shared Service Provider Agency Support** – Provides agencies the ability to review their Batch Match and Payment Integration results in the Portal when a Shared Service Provider submits their payments.
5. **Whitelisting** – Provides agencies with ability to whitelist select payees from presentation in their match results. Provide agencies the ability to add and/or delete payees from the whitelist and review whitelisted payees for changes.
6. **Business Rules –** Allows application of business rules to systematically filter PAM Payment, Batch Match, and Continuous Monitoring results.
7. **Transition to New Portal Technology** – Transitions the Treasury's Working System front-end application to a new Portal technology platform that will enable a more fluid user interface that will be easier to use.
8. **Adjudication Report** – Payment matches are 100% adjudicated from within the Portal, and the adjudication will autopopulate the monthly summary report turned into Treasury.
9. **Adding Data Sources to Payment Integration** – Treasury will be adding additional data sources listed in IPERIA to the payment integration processes. The remaining IPERIA data source is CAIVRS.
10. **Reporting Capabilities** – Summary reports are available from within the Portal.
11. **Web Services** – Treasury's Working System supports the integration of secure Web services.
12. **User Interface Enhancements** – Based on feedback from users, Treasury enhanced the user interface to make it more suited to agency processes and reflects how the user community is using the Portal.
13. **Batch Processing** – Treasury's Working System provides batch results back to agencies via a file or from within the Portal. Currently it is only from within the Portal.