

U.S. DEPARTMENT OF ENERGY

Enterprise Risk Management

Fiscal Year 2023 Guidance



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Department of Energy
Washington, DC 20585

December 20, 2022

MEMORANDUM FOR DISTRIBUTION

FROM: KARIN DASUKI
DIRECTOR, OFFICE OF FINANCE AND ACCOUNTING

SUBJECT: Department of Energy FY 2023 Enterprise Risk Management Guidance

The attached Department of Energy (DOE) FY 2023 Enterprise Risk Management (ERM) Guidance provides DOE's framework for ERM as required by Office of Management and Budget (OMB) Circular A-123, Management's Responsibility for Enterprise Risk Management and Internal Control. This ERM guidance includes risk management, internal controls and a fraud risk framework that meets the requirements of the Government Accountability Office (GAO) *A Framework for Managing Fraud Risks in Federal Programs*.

DOE's ERM and Internal Control Program continues to execute initiatives to reduce burdens on reporting organizations while maintaining effective internal controls for the Department. The initiatives are:

- Restructuring and developing overarching ERM Guidance that aligns with OMB Circular A-123 having Internal Controls being a sub-part of ERM;
- Continuing the implementation of a Departmental Fraud Risk Framework to mitigate and reduce potential fraud activities by establishing risk tolerances, refining its Risk Profile and Fraud Risk Profile activities, and establishing a data analytics program that leverages existing business practices;
- Establishing a hybrid Internal Control Program that will allow reporting organizations to adopt a business process approach or data analytics approach as part of its financial management control test cycle; and,
- Continuing the synchronization of the Department's Risk Profile to the Planning, Programming, Budgeting, and Execution processes to better align funding to needed resources during Budget Formulation.

Heads of Departmental Elements (Field and Headquarters) and Under Secretaries are responsible for maintaining an ERM Program that includes evaluating internal controls and reporting the evaluation results to the Secretary in annual Assurance Memoranda. These Assurance Memoranda report on the overall adequacy and effectiveness of internal controls, identify any material weaknesses or significant deficiencies and assert financial management systems compliance with government-wide requirements. These individual organizational assurances are compiled to support the Secretary's annual assurances in DOE's annual Agency Financial Report (AFR).

Signed Assurance Memoranda are due from Field Elements on **August 31, 2023**, Headquarters Offices on **September 14, 2023**, and each Under Secretary on **September 21, 2023**. If there is an issue preventing a timely Assurance Memorandum, organizations must provide the reason(s) for the delay and advance notice of any potential significant deficiencies or material weaknesses to the monitored Internal Controls and Fraud Risk Management Division mailbox. A summary of all key dates and deliverables is provided in **Table 2 Consolidated Summary of DOE ERM Important FY 2023 Dates**, found in **page 6**.

If you have any questions about this guidance, please contact cfo-icfrmd@hq.doe.gov. This is a monitored mailbox and individuals contact numbers and names monitoring the mailbox can be found when you list the email address.

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I. Introduction

A. Purpose and Background

Enterprise Risk Management (ERM) requirements are codified in the Office of Management and Budget (OMB) Circular A-123 (Circular A-123), *Management's Responsibility for Enterprise Risk Management and Internal Control*. After OMB published OMB Circular A-123 in 2016, the Chief Financial Officers Council (CFOC) and the Performance Improvement Council (PIC) published the *Playbook: Enterprise Risk Management for the U.S. Federal Government* (Playbook) to assist Federal agencies with addressing the additional ERM requirements in OMB Circular A-123 including making improved decisions by having a holistic view of risks and their interdependencies.

B. OMB Circular A-123

OMB Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, provides guidance for ERM and internal control requirements. OMB Circular A-123 establishes the requirement for agencies to establish an ERM framework. An agency's ERM framework includes the following elements:

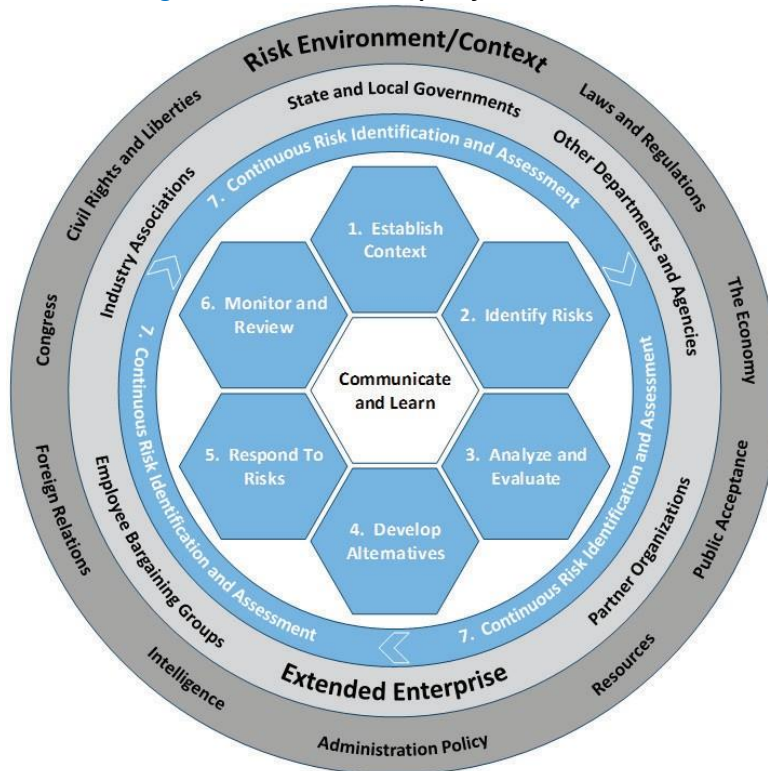
- Risk appetite - amount of risk an organization is willing to accept in pursuit of its mission and vision. It is established by the organization's most senior level leadership and serves as the guidepost to set strategy and select objectives.
- Risk tolerance - acceptable level of variance in performance relative to the achievement of objectives. It is generally established at the program, objective, or component level. In setting risk tolerance levels, management considers the relative importance of the related objectives and aligns risk tolerance with risk appetite.
- A portfolio view of risk - provides insight into all areas of organizational exposure to risk (Such as reputational, programmatic performance, financial, information technology, acquisitions, human capital, etc.), thus increasing the chances of experiencing fewer unanticipated outcomes and executing a better assessment of risk associated with changes in the environment.

The Department of Energy (DOE) uses the ERM model as depicted in OMB Circular A-123, which includes:

1. Establishing the context by understanding the internal and external environments of the organization.
2. Initial risk identification that uses a systematic approach to recognizing the potential for undesired outcomes.
3. Analyzing and evaluating the risks to include the probability and impact.
4. Developing alternative risk responses that are guided by the organization's risk appetite.
5. Responding to risks by deciding and executing the best course of action for the appropriate response strategy.
6. Monitoring the performance to determine whether the executed response strategy achieved the goals and objectives.
7. Conducting continuous risk identification, which is an on-going process.

An illustrative example of the model is identified in [Figure 1 Illustrative Example of an ERM Model](#).

Figure 1 Illustrative Example of an ERM Model



Source: Playbook: Enterprise Risk Management for the U.S. Federal Government (CFOC)

II. DOE's Enterprise Risk Management Framework

As DOE's ERM Framework matures, risk management, budget formulation, and performance management will become an integrated, seamless, and coordinated effort. DOE's ERM Framework consists of horizontal and vertical interdependencies beginning with the governance structure. The Departmental Internal Control and Assessment Review Council (DICARC)/Senior Risk Management Council (SRMC) is the governance body, formally chartered by the Secretary, that provides oversight for DOE's ERM and Internal Control Program. The DICARC/SRMC is chaired by the Deputy Chief Financial Officer (DCFO). The DICARC/SRMC members consist of Senior Executive Service (SES) personnel representing various Headquarter Offices throughout DOE. There is a subset of the DICARC/SRMC called the Senior Assessment Team (SAT), which is responsible for overseeing DOE's anti-fraud strategy. The SAT is chaired by the Chief Risk Officer (CRO).

Figure 2 DOE ERM Framework

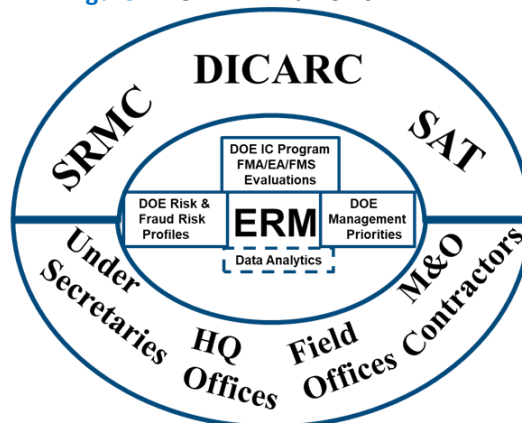
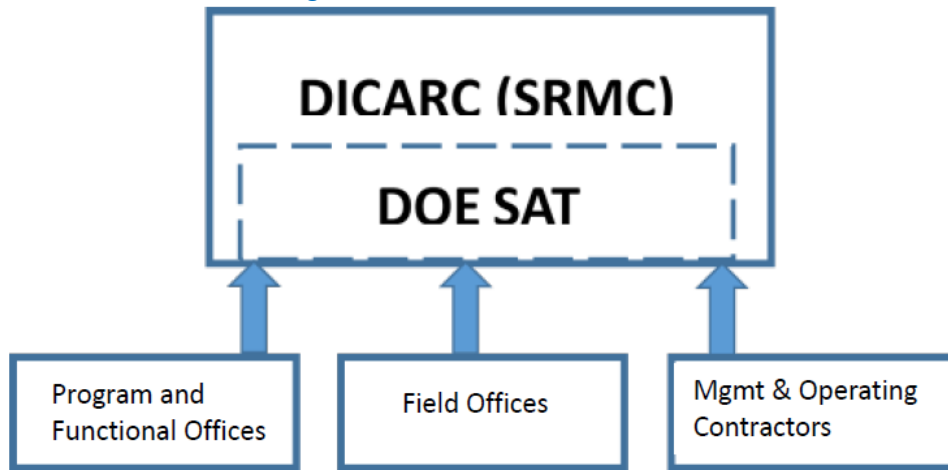
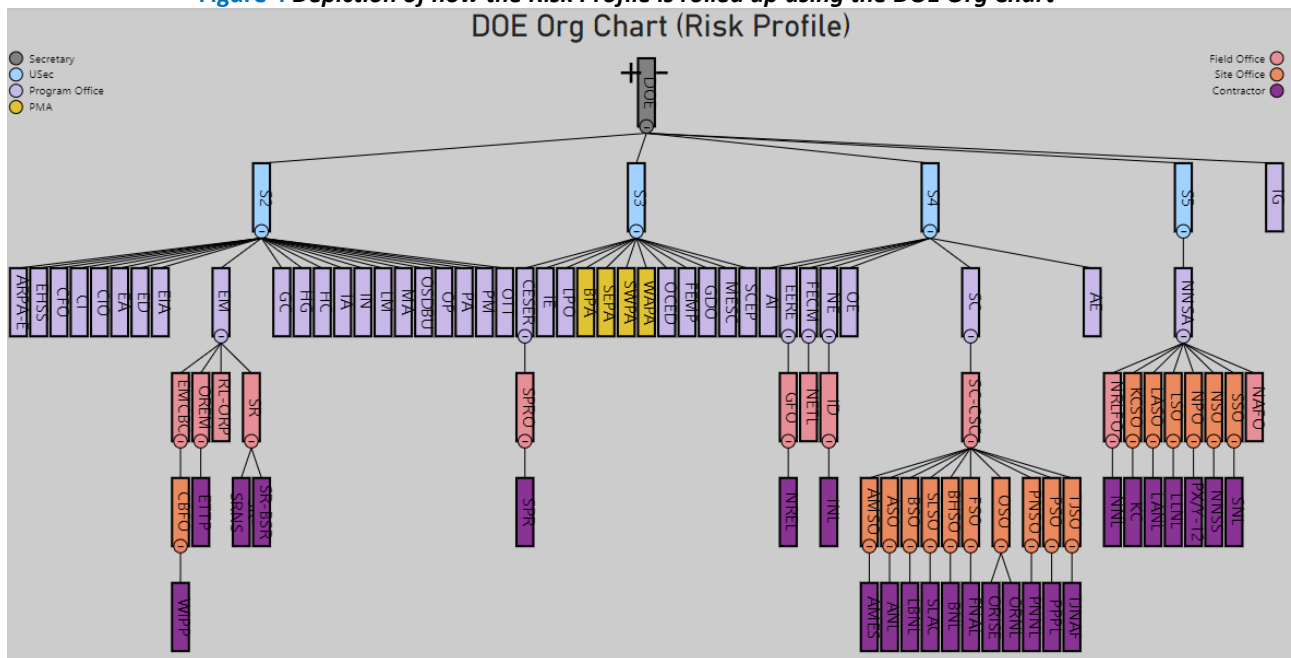


Figure 3 DICARC/SRMC and the SAT



The DICARC/SRMC provides oversight of DOE's Risk Profile activities. Risk profiles are prepared by organizations at each reporting level (M&O Contractor, Field Offices, Headquarter Offices, and Under Secretary Offices) across the Department with risks being submitted to the next higher-level organization for consideration in the development of the next higher-level organization's risk profile.

Figure 4 Depiction of how the Risk Profile is rolled up using the DOE Org Chart¹



Organization's risks should always consider DOE's risk appetite and risk tolerances. Risk tolerances are linked to risk categories and DOE's Management Priorities (See Table 27), which are the greatest concerns of Senior Leadership across the Department, and with proper risk mitigation will allow DOE to accomplish its strategic objectives. DOE's strategic objectives support the Department's goals in the accomplishment of its mission.

¹ DOE Organization chart includes newly established offices that are in the process of getting incorporated into the Internal Control and ERM Program.

Table 1 FY 2022 - 2026 DOE Goals and Strategic Objectives

Goal 1: Drive U.S. Energy Innovation and Deployment on a Path to Net-Zero Emissions by 2050

Strategic Objective 1 – Drive innovation of cost-efficient and affordable clean technologies and solutions through Research, Development, Demonstration, and Deployment (RDD&D) and Carbon Management
Strategic Objective 2 – Accelerate deployment of clean technologies at scale and pace
Strategic Objective 3 – Engage internationally to achieve global decarbonization and energy security while expanding markets for U.S. clean energy goods and services
Strategic Objective 4 – Catalyze clean energy solutions for job creation and economic growth, including with a robust place-based focus



Goal 2: Strengthen the Nation’s Energy Security, Resiliency, Affordability, and Reliability

Strategic Objective 5 – Develop and deploy innovative solutions to harden energy infrastructure against physical threats including climate change
Strategic Objective 6 – Advance adoption of solutions to prevent and respond to cyber vulnerabilities and incidents
Strategic Objective 7 – Secure the supply chain for a robust clean energy transition
Strategic Objective 8 – Support an effective emergency response capability in the federal government for responding to critical energy events
Strategic Objective 9 – Implement consolidated interim storage for the Nation’s spent nuclear waste

Goal 3: Advance Science Discovery and National Laboratory Innovation

Strategic Objective 10 – Advance basic scientific understanding and identify new methods and tools to further discovery
Strategic Objective 11 – Lead globally in key innovation and national security areas including clean energy technologies, artificial intelligence, quantum information sciences, microelectronics, advanced computing, particle accelerator technologies, and next generation biology and biosecurity
Strategic Objective 12 – Commercialize innovations to improve the lives of Americans and the world

Goal 4: Ensure America’s Nuclear Security by Harnessing Unparalleled Science and Technology Capabilities

Strategic Objective 13 – Design, deliver, and maintain a safe, secure, reliable, and effective nuclear stockpile in support of the Nation’s integrated deterrent
Strategic Objective 14 – Forge and deliver cutting-edge solutions to shape and enable future arms control and nonproliferation regimes, increase strategic stability, counter nuclear terrorism, disrupt emerging threats, and advance the safe, secure, and peaceful use of nuclear energy
Strategic Objective 15 – Harness the atom to safely, reliably, and affordably power a global fleet that enables unrivaled responsiveness, endurance, stealth, and warfighting capability

Goal 5: Promote Equity and Energy Justice

Strategic Objective 16 – Advance equity in DOE’s procurement, funding, R&D, and D&D processes and activities
Strategic Objective 17 – Increase access to affordable, sustainable, and reliable energy for disadvantaged communities
Strategic Objective 18 – Ensure 40 percent of the overall benefits of relevant federal investments are delivered to disadvantaged communities
Strategic Objective 19 – Support economic development, including through clean economy opportunities for workers in communities and industries in transition
Strategic Objective 20 – Enhance engagement and energy economic development opportunities in tribal communities
Strategic Objective 21 – Support diversity and equity among researchers, projects, entrepreneurs, and the National Laboratories

Goal 6: Advance Clean-Up of Radioactive and Chemical Waste

Strategic Objective 22 – Support environmental remediation

Goal 7: Operational Excellence

Strategic Objective 23 – Attract, manage, train, and retain the best federal workforce to meet future mission needs

Strategic Objective 24 – Use taxpayer funds efficiently and improve visibility into how funds are being used

Strategic Objective 25 – Monitor Departmental performance to ensure that program activities are executed in a safe and secure manner consistent with Departmental direction

When assessing risks, leaders and their organizations should consider the various types of external and internal risks that may influence DOE's accomplishment of its goals, objectives, and mission. The risks should be grouped into categories to provide a meaningful understanding of the potential impact on DOE's strategic objectives, which influences the goals and mission accomplishment. DOE's risk categories include the Department's Management Priorities along with other internal and external influences. In addition, leaders and their organizations should consider relationships between risk types and the Department's objectives.

Figure 5 Portfolio View of the Relationship Between Objectives and Risk



Source: SSA Integrity Act Handbook, Chapter 3: Enterprise Risk Management

Table 2 Consolidated Summary of DOE ERM Important FY 2023 Dates

Key Dates	Deliverables
November 9	OCFO provides Data Analytics Data Call Template to reporting organizations.
December 16	Reporting organizations will provide Data Analytics Data Call request using the Data Analytics Template to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV . AMERICA open for documenting FY 2023 internal control testing and evaluation results.
February 9	Headquarters Offices and Power Marketing Administrations (PMA) that did not submit a FY 2022 Risk Profile will provide the Risk Profile, Excel and signed PDF versions , with consideration of reporting from Field Offices, Site Offices, and M&O Contractors as applicable. Headquarter Offices and PMAs that provided a FY 2022 Risk Profile may provide a signed memorandum from the organization's management indicating there are no changes from the FY 2022 Risk Profile to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV . Reporting organizations should check with their cognizant organization to determine substantive changes for Risk Profiles and follow cognizant organizations subsequent timelines to assure Risk Profiles are provided to DOE on time.
March 9	Under Secretaries provide Risk Profile, Excel and signed PDF versions, if there are substantive changes to risks or a signed memorandum indicating there are no changes from the FY 2022 Risk Profile , to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV based on input of the reporting offices.
March 16	Reporting organizations (M&O Contractors, Site Offices, Field Offices, & HQ Offices) provide Interim Internal Control Status using the AMERICA Application.
April 6	OCFO provides the FY 2023 Assurance Memoranda Template to reporting organizations.
April 20	OCFO completes DOE Risk Profile and Fraud Risk Profile as required by OMB and GAO's Fraud Risk Framework in preparation for the Annual Strategic Review and the FY 2025 Budget Formulation Process.
May 25	OCFO provides the lead coordinating offices with Management Priorities in required templates for FY 2023 update. Note: Applicable to Management Priority Lead Coordinating Offices Only.
June 22	Lead coordinating offices provide OCFO with mid-year updates on Management Priorities using provided templates based on FY 2023 planned and performed enterprise activities. Note: Applicable to Management Priority Lead Coordinating Offices Only.
July 13	M&O Contractors and Field Offices provide FMA Module and EA Module using the AMERICA Application. Reporting organizations should follow subsequent timelines published by cognizant organizations to assure FMA and EA Modules are provided to DOE on time.
July 27	Headquarters Offices and PMAs provide FMA Module and EA Module using the AMERICA Application.
August 10	Field Offices provide <u>draft</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV , considering and incorporating Site Offices and M&O Contractors. Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Draft".
August 28	OCFO provides eDOCS information to Headquarters Offices.
August 31	Field Offices provide <u>signed</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV . Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Signed". Headquarters Offices and PMAs provide <u>draft</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV . Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Draft".
September 7	Lead coordinating offices provide OCFO with Management Priorities year-end updates. Note: Applicable to Management Priority Lead Coordinating Offices Only

Key Dates	Deliverables
September 7	Headquarter Offices, PMAs, Field Offices, M&O Contractors send their elected control test cycle approach for FY 2025 to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV .
September 14	Headquarters Offices and PMAs provide <u>signed</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV and eDOCS. Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Signed" .
September 21	Under Secretaries provide <u>signed</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV .
September 22	AMERICA close-out for FY 2023.
October 2	Organizations that resolve or identify a significant deficiency or material weakness, after June 30, 2023, and no later than September 30, 2023, that is not included in a signed Assurance Memoranda, must notify the OCFO and update the Assurance Memoranda.
October - TBD	OCFO will provide Management Priorities updates to the DICARC in early October for review. Note: Applicable to Management Priorities Lead Coordinating Offices Only. Per DICARC recommendation, the final Management Priorities are incorporated into the AFR and proceed through Exec Sec Concurrence Process.

A. Risk Profile and Fraud Considerations in the Risk Profile

DOE prepares a consolidated agency risk profile annually. The consolidated risk profile takes into consideration reporting organizations' risk profiles as well as their Financial Management Assessment (FMA), and Entity Assessment (EA) submissions from the Department's A-123 Application (AMERICA). Likewise, on an annual basis, DOE requires each Under Secretary and Headquarter Offices to prepare and submit a risk profile taking into consideration the risk profiles from Field Offices, Integrated Management and Operating (M&O) Contractors and Integrated non-M&O Contractors or submit a memorandum stating that risks were reviewed, and the reporting organization determined there were no substantive changes or updates to report for the current year risk profile.

Integrated Contractors, **including both M&O and integrated non-M&O Contractors**, must provide a Risk Profile in accordance with the guidance in [Section III. Appendix A, Risk Profile Guidance](#), to the cognizant Field Office. Field Offices, taking into consideration the Integrated Contractors **including both M&O and integrated non-M&O Contractors** must provide a Risk Profile to the cognizant Headquarters Office. Each Headquarters Office, PMA, and Under Secretary must prepare a Risk Profile identifying their top risks in accordance with the due dates in [Table 3 DOE Risk Profile Important FY 2023 Dates](#). M&O Contractors and Field Offices should refer to their cognizant Headquarters Office for supplemental guidance for their organization's specific processes and internal timelines.

For FY 2023, reporting organizations that submitted a Risk Profile in FY 2022 can submit a **memorandum indicating there are no significant or substantive changes** from the organization's FY 2022 Risk Profile using the [Risk Profile Memorandum Template](#) located at the end of [Appendix A, Risk Profile Guidance](#). Reporting organizations that submitted a Risk Profile Memorandum in FY 2022 are required to submit a Risk Profile in FY 2023.



The Risk Profiles from each Under Secretary, and each Headquarters Office not reporting to an Under Secretary, will be consolidated into a prioritized DOE Risk Profile and used during the Department's FY 2025 budget formulation process and discussed as part of the annual Strategic Review with OMB in May.

Table 3 DOE Risk Profile Important FY 2023 Dates

Key Dates	Deliverables
February 9	Headquarters Offices and Power Marketing Administrations (PMA) <u>that did not submit a FY 2022 Risk Profile will provide the Risk Profile, Excel and signed PDF versions,</u> with consideration of reporting from Field Offices, Site Offices, and M&O Contractors as applicable. <u>Headquarter Offices and PMAs that provided an FY 2022 Risk Profile may provide a signed memorandum from the organization's management indicating there are no changes from the FY 2022 Risk Profile</u> to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV . Reporting organizations should check with their cognizant organization to determine substantive changes for Risk Profiles and follow cognizant organizations subsequent timelines to assure Risk Profiles are provided to DOE on time.
March 9	<u>Under Secretaries provide Risk Profile in both Excel and signed PDF versions if there are substantive changes to risks, or a signed memorandum indicating there are no changes from the FY 2022 Risk Profile,</u> to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV based on input of the reporting offices.
April 20	OCFO completes DOE Risk Profile and Fraud Risk Profile as required by OMB and GAO's Fraud Risk Framework in preparation for the Annual Strategic Review and the FY 2025 Budget Formulation Process.

In FY 2023, DOE will continue synchronizing risk profile and budget formulation processes. Risk consideration is a key element during budget formulation and is vital in an organization's planning process. As such, risk management professionals should be part of every organization's leadership effort for planning future years' budgets. At the DOE enterprise level, resource planning is an organizational effort that is guided by the Office of the Chief Financial Officer (OCFO). This approach provides oversight that the agency's risk posture is reflected in the Department's budget, addresses budget needs for key controls to mitigate the most important risks and reflects the priorities and risk appetite of the Department's leadership. The Department's risk profile is also used to shape discussions between DOE and OMB in supporting budget justifications. Leadership should consider risks during budget execution with discussions on funding to improve performance while responding to emerging risks.

The Risk Profile requires both identification and analysis of risks, **including fraud risks.** Risk identification offers a structured and systematic approach to recognizing where the potential for undesired outcomes can arise. Risk analysis and evaluation considers the causes, sources, probability of risk occurring, potential outcomes, and prioritizes the results of the analysis. Reporting organizations' risk profiles must identify the risks, **including fraud risks,** to achieve agency strategic objectives and the appropriate options for addressing the risks. Organizations should analyze the risks in relation to the achievement of the strategic goals and objectives presented in the DOE Strategic Plan as well as internal control objectives related to operations, compliance, and reporting. For further details, see [Appendix A, Risk Profile Guidance](#).

In FY 2023, reporting organizations will continue to identify the top financial and non-financial fraud risks in the Risk Profile. These ongoing fraud risks must be included in each entity's Risk Profile deliverable along with other identified risks. Reporting organization's fraud risks that are identified in their Risk Profile and AMERICA will be considered in the Department's Fraud Risk Register as part of DOE's strategy to identify and mitigate potential fraud risk occurrences. DOE's Fraud Risk Register is vital in preparing and maintaining a relevant Fraud Risk Profile.

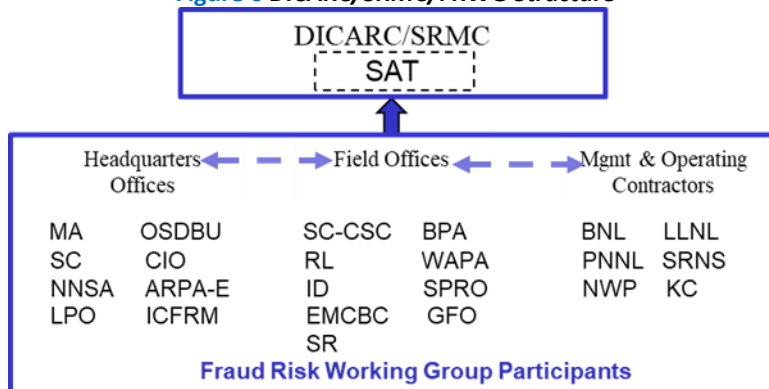
B. Fraud Risk Management

DOE must continue to enhance and mature its fraud risk management efforts through *Fraud Risk Management* ([Appendix B](#)), *Internal Controls* ([Appendix C](#)), and *Data Analytics* ([Appendix D](#)). The passing of the *Infrastructure Investment and Jobs Act (Infrastructure Bill)*, *Inflation Reduction Act (IRA)*, and *CHIPS and Science Act* has increased funding for DOE activities and increases the risk of fraudulent activities with taxpayer's resources.

In FY 2023, DOE will continue implementing the plan for its Fraud Risk and Data Analytics Framework by coordinating and executing fraud risk management and mitigating activities through various working groups, with SAT such as the Data Analytics Working Group (DAWG) and Fraud Risk Working Group (FRWG), and SAT oversight. Both groups are represented by organizations at various levels throughout the Department. For further details, see [Appendix B, Fraud Risk Management Guidance](#).



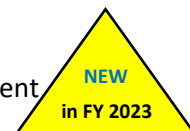
Figure 6 DICARC/SRMC/FRWG Structure



In FY 2023, DOE will complete Phase 1 of its Fraud Risk and Data Analytics Framework plan with the DAWG, led by OCFO, issuing a Department-wide data call to gather information regarding data analytic activities that are executed within organizations throughout DOE. The data call results will provide the starting point for initiating a formal Department data analytics program by leveraging existing data analytic activities. For further details, see [Appendix D, Data Analytics Guidance](#).



The SAT, supported by the FRWG, will continue to refine DOE's Fraud Risk Register and Fraud Risk Profile, originally prepared in FY 2022, by determining risk tolerances for the Department's Management Priorities and risk categories. For further details, see [Appendix B, Fraud Risk Management Guidance](#).

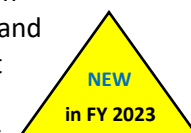


In FY 2023, DOE's Internal Control Program will continue to focus on assessing fraud risks and identifying controls to mitigate identified fraud risks. Reporting organizations will begin mapping, when possible, DOE's fraud risks to potential fraud risks their organizations may encounter. For further details, see [Appendix C, Internal Controls Evaluations Guidance](#).



C. Internal Controls

As part of DOE's fraud risk management efforts in FY 2023, the Department's Internal Control Program will take a more collaborative approach to its Focus Area Risks in AMERICA by being less prescriptive and coordinating with Field Offices and their reporting organizations. By doing so will allow more efficient use of limited resources while mitigating potential fraud risk occurrences. Headquarter reporting organizations' focus area risks will concentrate on assessing the Acquisition Management, Contractor Oversight, Improper Payments, and Financial Assistance risks by testing and refining the controls that are mitigating these risks. Field Offices and M&O Contractors focus area risks will concentrate on each



organization's highest vulnerabilities. In addition to DOE's revised approach for identifying its Focus Area Risks, reporting organizations risk assessments will also focus on identifying and mitigating risks related to the *Infrastructure Bill, IRA, and CHIPS and Science Act*, where applicable. For further details, see [Appendix C, Internal Controls Evaluations Guidance](#).

D. Data Analytics

In FY 2022, the OCFO formed a Data Analytics Working Group (DAWG) to leverage, integrate, and synchronize the various data analytic efforts that are being performed across the Department. The DAWG is represented by Headquarters and Field Office personnel across DOE and led a data analytics data call in Quarter 1, FY 2023 with an initial focus on six areas, which are rebates, grants/cooperative agreements, loans, cybersecurity, labor charging, and materials & services. Initial efforts in FY 2023 are grouping DOE's various data analytic activities that are conducted across the Department into a synchronized and integrated effort that will enhance the Department and its organization's ERM and Internal Control Programs. For further details, see [Appendix C, Fraud Risk Management Guidance](#).



E. Management Priorities

Management Priorities represent the most important strategic management issues facing the Department and are reviewed and identified by the DICARC/SRMC. The DICARC/SRMC considers the results and any significant deficiencies and/or material weaknesses reported in the Departmental Elements' Assurance Memoranda. The DICARC/SRMC also consults and considers the DOE Inspector General's (IG) Management Challenges and the Government Accountability Office's (GAO) biennial High Risk Series update when assembling DOE's Management Priorities.

The Department's Management Priorities are identified in [Table 27 DOE's Management Priorities and Lead Coordinating Offices](#). Each DOE Management Priority is assigned a Senior Executive and lead coordinating office to track progress and provide enterprise level updates for inclusion in the FY 2023 Agency Financial Report. For further details, see Section [VII. Appendix E, Management Priorities Guidance](#).

III. Appendix A, Risk Profile Guidance

A. Purpose and Background

In FY 2023, DOE continues to comply with OMB Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, which provides guidance for internal control and risk management requirements. OMB Circular A-123 also establishes the requirement to produce an agency Risk Profile as part of the implementation of an Enterprise Risk Management (ERM) capability coordinated with strategic planning, strategic review, and internal control processes.

OMB Circular A-123 requires:

- Integration of risk management and internal control functions;
- Implementation of an ERM capability in coordination with the strategic planning and strategic review process required by the *Government Performance and Results Act Modernization Act* (GPRAMA) and the internal control processes required by the *Federal Managers Financial Integrity Act* (FMFIA);
- Incorporation of risk identification capabilities into the framework to identify new/emerging risks or changes in existing risks; and,
- Development of a Risk Profile, including fraud risk evaluation, coordinated with annual strategic reviews.

The DOE Risk Profile identifies the most significant risks faced by the Department in meeting strategic objectives and communicates the strategy for addressing those significant risks. Significant risks are captured from detailed financial and non-financial risks reported through AMERICA to provide an entity wide view of all risks. Risks are analyzed in relation to the achievement of objectives in the following areas:

- **Strategic:** DOE strategic goals and objectives
- **Operations:** effective and efficient use of DOE resources in administrative and major program operations, including financial and fraud objectives covered in annual internal control testing
- **Compliance:** DOE compliance with applicable laws and regulations
- **Reporting:** reliability of DOE internal and external financial or non-financial reporting

Risk consideration is a key element during budget formulation and vital to an organization's planning process. As such, risk management professionals should be part of every organization's leadership effort for planning future years' budget. At the Department level, resource planning is a joint effort that is guided by the Chief Financial Officer (CFO) and CRO. Using this approach, the Department's risk posture is reflected in DOE's budget, addresses budget needs for key controls to mitigate the most important risks and reflects the priorities and risk appetite of the Department's leadership. The Department's risk profile is also used to shape discussions between DOE and OMB in supporting budget justifications. Leadership should also consider risks during budget execution with discussions on funding to improve performance while responding to emerging risks

III-A.1. Risk Profile Deliverable Requirements

The Risk Profile deliverable must be reviewed and approved by the reporting organization's management. The Risk Profile template includes a signature box at the top where the entity's management should document the approver name, title, and signature. Reporting organizations with substantive changes to risks in their FY 2023 Risk Profile are required to provide both the completed Risk Profile Excel template as well as a PDF version of the template with management's signature (electronic signature is acceptable). **This deliverable is NOT submitted through the A-123 Application, AMERICA.** Both the PDF and Excel Risk Profile documents will be sent to the Internal Controls and Fraud Risk

Management Division's (ICFRMD) e-mail address at CFO-ICFRMD@hq.doe.gov. Reporting organizations that **do not have substantive changes** to risks in their FY 2023 Risk Profile may provide a signed memorandum² from the organization's management indicating there are no substantive changes from the organization's FY 2022 Risk Profile. The signed memorandum will be sent to the ICFRMD's shared mailbox at CFO-ICFRMD@hq.doe.gov. Refer to **Table 4** to determine your organization's reporting options. **Reporting organizations that did not provide a Risk Point of Contact (POC) in FY 2022, will identify and provide the name of their Risk POC to the OCFO.**



Table 4 Risk Profile Submission Requirements

Risk Profile Submission Requirements	
Organizations that submitted a Risk Profile Memorandum in lieu of Risk Profile in FY 2022	Must submit a Risk Profile in FY 2023
Organizations that have significant risk changes compared to FY 2022	Must submit a Risk Profile in FY 2023
New Organizations that did not submit a Risk Profile in FY 2022	Must submit a Risk Profile in FY 2023
Organizations that submitted a Risk Profile in FY 2022 and do not have significant changes in risks in FY 2023	May submit a Risk Profile Memorandum in lieu of a Risk Profile in FY 2023

Integrated Contractors, **including both M&O and integrated non-M&O Contractors**, are required to identify and analyze their risks, including fraud risks, and provide a Risk Profile using the **FY 2023 Risk Profile template** to the cognizant Field Office. Field Offices, taking into consideration the Integrated Contractors **including both M&O and integrated non-M&O Contractors** are required to identify and analyze the risks, including fraud risks, and provide a Risk Profile using the **FY 2023 Risk Profile template** to the cognizant Headquarters Office. Each Headquarters Office, PMA, and Under Secretary are required to prepare a Risk Profile **using the FY 2023 Risk Profile template** identifying their top risks, including fraud risks, in accordance with the due dates in **Table 3 DOE Risk Profile Important FY 2023 Dates**. **Risk Profiles will be returned to reporting organizations that do not use the FY 2023 Risk Profile template.** Risk Profiles from each Under Secretary, and each Headquarters element not reporting to an Under Secretary, will be consolidated into a prioritized DOE Risk Profile and used during the Department's FY 2025 budget formulation process and as part of the annual Strategic Review with OMB in May. The risks identified as fraud related in the Risk Profile will also be considered for DOE's Fraud Risk Profile.



III-A.2 Risk Profile, FMA, and EA Module Reporting

To the extent additional internal controls are necessary to manage or mitigate risks identified in Risk Profiles, the controls must be established and evaluated as part of annual internal control testing and attested to in the annual assurance statement. If a control existed in last year's Risk Profile deliverable and was tested, the reporting organization may treat it in the same manner as a focus area exemption.

² Use the prescribed Risk Profile Memorandum Template provided in this Appendix.

Reporting organizations should indicate where each reported risk is evaluated using the Current Evaluation Category column (Column M). Risk Profile financial risks must be documented and evaluated, including the establishment and testing of controls when applicable, in the **FMA Module** in AMERICA. Risk Profile non-financial risks are evaluated, including the establishment and testing of controls when applicable, as part of the Entity Assessment (EA) process and reported in the appropriate section of the **EA Module** in AMERICA. Internal control risks are assessed and reported in the **Internal Control Evaluation** tab and the entity objective risks are assessed and reported in the **Entity Objective Evaluation** tab.

Entities should continue to provide further detail of where risks are being evaluated within the EA or FMA Modules using the Current Evaluation Details column (Column N). For example, if the current evaluation category is "Internal Control Evaluation," indicate which of the 17 Principles the risk is evaluated. If the current evaluation category selected is "Entity Objectives Evaluation," identify the specific entity objective. For the FMA Module, if the current evaluation category is "FMA Evaluation," identify the sub-process where the controls are located that mitigate the risk.

III-A.3. Instructions for Risk Profile Template

The Risk Profile Template involves the identification and analysis of risk. Risk identification offers a structured and systematic approach to recognizing where the potential for undesired outcomes can arise. Risk analysis and evaluation considers the causes, sources, probability of risk occurring, the potential outcomes, and prioritizes the results of the analysis.

When identifying and analyzing your organization's risks, consider these questions:

- What are the organization's goals and objectives that support the DOE Strategic Plan?
- What events could happen that would prevent the organization from achieving its goals and objectives aligned with the DOE Strategic Plan?
- What events could impede effective or efficient use of resources for Departmental operations?
- What events could affect reliability, accuracy, or timeliness of reporting?
- What events could prevent the organization from achieving compliance with statutory, Congressional, OMB, or other requirements?
- What are the corresponding impacts of these risks and what is the severity of this impact?
- What is the likelihood that this event will occur?
- What are the most significant risks?
- What are the fraud risks?
- Which risks require a response?
- What actions will you take to address these risks? What actions could you take in the future to address these risks?
- Did the actions taken to address a risk have an effect? Is there any remaining residual risk? If so, what is the severity of impact and likelihood of occurrence of this risk?
- Who is accountable for the actions to address the risk?

After risks are identified, management must determine a risk response. In determining a risk response, management should consider risk tolerance, placement of controls, and other mitigating actions. Risk tolerance is particularly important as management has significant discretion in setting risk tolerance levels. The GAO's *Standards for Internal Control in the Federal Government* (Green Book) defines risk tolerance as the acceptable level of variation in performance relative to the achievement of objectives. Risk tolerance levels will significantly impact management's risk response decisions and should always be considered.

The Risk Profile template is presented in **Figure 7 Risk Profile Template**, followed by instructions explaining how to complete each column in the FY 2023 Risk Profile. The [template](#) and instructions will be provided in Excel for your organization's use in completing the Risk Profile.

Figure 7 Risk Profile Template

FY 2023 RISK PROFILE TEMPLATE																					
Reporting Organization's Review & Approval		Please Note: Reporting Organization Sign-Off is Required Prior to Submitting to DCFD																			
		Name & Title / Signature										Date									
Risk #	Risk Name	Risk Statement	Risk Category	Fraud Impact	Identification of Objectives	Strategic Objective of Risk	Inherent Risk Rating		Current Risk Response				Residual Risk Rating		Proposed Risk Response			Risk Owner POC	Validation	Residual Risk Score	
							Impact	Likelihood	Current Strategy	Current Action/Controls	Transfer Share Organization	Current Evaluation Category	Current Evaluation Details	Impact	Likelihood	Proposed Strategy	Proposed Additional Actions				Proposed Implementation Category
1																					
2																					
3																					
4																					
5																					
6																					
7																					
8																					
9																					
10																					
11																					
12																					
13																					
14																					
15																					
Organization POC																					
POC Phone Number																					

NOTE: Verify that the file is “Enabled” by clicking on “File,” “Enable Content,” “Enable All Content” before entering data into the template. Provide Name and Title of the Department Head approving the Risk Profile and the date when the Risk Profile was completed. Provide the POC Name and POC phone number at the bottom of the Risk Profile. After completion, the Risk Profile must be produced in PDF format with signature as well.

Risk # (Column A): This column is pre-populated with a unique number and used to assign a numerical ID to each identified risk.

Risk Name (Column B): Use this column to name the identified risk statement. This risk name can be used for easy identification of a specific risk statement across an entity.

Risk Statement (Column C): Use this column to identify risks and the impacts/ effects. Use the “if, then” sentence construction to describe the event (“if”) and the impacts (“then”). List all possible impacts in the statement and do not limit the statement to a single impact to avoid understatement of the risk. For example:

- If the roof collapses at Building X, then workers may be injured, water infiltration can damage equipment, and the protected area adjacent to Building X will be more vulnerable to additional damage that could render the storage of nuclear material unsafe.
- If we lose technical capabilities in the program’s workforce, then we will not be able to complete the work on schedule and at cost.

Risk Statements are not meant to be descriptions of issues, meaning risks that have already occurred, but are potential events that could occur. Some risks may be unavoidable and beyond an organization’s ability to reduce to a tolerable level. Nevertheless, the organization should identify these risks, make contingency plans, and manage risks against those plans to the best of abilities. For example, many organizations have to accept risks that arise due to natural disasters that cannot be controlled but may have emergency response mechanisms in place to mitigate against these risks.

Risk Category (Column D): Use this column to select a risk category to describe the identified risk. The drop-down menu lists the 10 management priorities identified in the FY 2022 Agency Financial Report (Contract & Major Project Management; Safety & Security; Environmental Cleanup; Nuclear Waste Disposal; Nuclear Stockpile Stewardship; Cybersecurity; Infrastructure; Human Capital Management & Diversity and Inclusion; Energy Justice; and Climate Change) along with seven other common risk categories (Political, Reputational, Information Technology Infrastructure, Grants/Loans/Financial Assistance, COOP, and Financial Management). These management priorities along with the other listed

categories serve as proxies for risk categories and will be used to aggregate risks. Select one risk category only. For instances where multiple risk categories may seem to apply, use best judgement to select the most relevant category. In addition, if the identified risk does not align with one of the listed risk categories, choose “Other” from the drop-down menu.

Dropdown Options:

- Contract & Major Project Management
- Safety & Security
- Environmental Cleanup
- Nuclear Waste Disposal
- Nuclear Stockpile Stewardship
- Cybersecurity
- Physical Infrastructure
- Human Capital Management & Diversity and Inclusion
- Energy Justice
- Climate Change
- Political
- Reputational
- Information Technology Infrastructure
- Grants/Loans/Financial Assistance
- COOP
- Financial Management (i.e., financial statements, financial reporting, etc.)
- Other

Fraud Impact (Column E): Use this column to identify if the risk is a Financial, Non-financial, Top Financial, or Top Non-financial fraud related risks. If a risk does not have a fraud impact, then organizations should select “N/A” from the drop-down menu. Note that if a fraud sub-category is not identified for each risk, an error will occur in the validation column (Column U).

Dropdown Options:

- Financial Fraud
- Non-Financial Fraud
- Top Financial Fraud
- Top Non-Financial Fraud
- N/A

Identification of Objectives (Column F): Risks must be linked to achievement of one of the four objectives identified by OMB: strategic objectives (objectives established in the DOE Strategic Plan), operational objectives (administrative and major program operations), reporting objectives (reliability of internal and external financial and non-financial reporting objectives), and compliance objectives (compliance with applicable laws and regulations). Only select one objective, and for instances where multiple objectives may seem to apply, use best judgement to select the most relevant objective.

Strategic Objective at Risk- Primary (Column G): This column has a drop-down menu that will allow only one choice. Use this column to select the strategic objective from the drop-down menu that the risk affects only if the “Strategic Objectives” option was selected in the Identification of Objectives column (Column F). The drop-down menu contains the strategic objectives from the Draft DOE Strategic Plan Framework. Select one primary strategic objective only, and for instances where multiple strategic objectives may seem to apply, use best judgement to select the most relevant strategic objective. If the

objective identified is anything but Strategic in the previous field, then select 'N/A - Strategic Objective was not selected as an objective in the previous field' for this column. Note that a validation error would occur if the requirement stated here is not fulfilled.

Dropdown Options:

- **Objective 1:** Drive innovation of cost-efficient and affordable clean technologies and solutions through Research, Development, Demonstration, and Deployment (RDD&D) and Carbon Management
- **Objective 2:** Accelerate deployment of clean technologies at scale and pace
- **Objective 3:** Engage internationally to achieve global decarbonization and energy security while expanding markets for U.S. clean energy goods and services
- **Objective 4:** Catalyze clean energy solutions for job creation and economic growth, including with a robust place-based focus
- **Objective 5:** Develop and deploy innovative solutions to harden energy infrastructure against physical threats including climate change
- **Objective 6:** Advance adoption of solutions to prevent and respond to cyber vulnerabilities and incidents
- **Objective 7:** Secure the supply chain for a robust clean energy transition
- **Objective 8:** Support an effective emergency response capability in the federal government for responding to critical energy events
- **Objective 9:** Implement consolidated interim storage for the Nation's spent nuclear waste
- **Objective 10:** Advance basic scientific understanding and identify new methods and tools to further discovery
- **Objective 11:** Lead globally in key innovation and national security areas including clean energy technologies, artificial intelligence, quantum information sciences, microelectronics, advanced computing, particle accelerator technologies, and next generation biology and biosecurity
- **Objective 12:** Commercialize innovations to improve the lives of Americans and the world
- **Objective 13:** Design, deliver, and maintain a safe, secure, reliable, and effective nuclear stockpile in support of the Nation's integrated deterrent
- **Objective 14:** Forge and deliver cutting-edge solutions to shape and enable future arms control and nonproliferation regimes, increase strategic stability, counter nuclear terrorism, disrupt emerging threats, and advance the safe, secure, and peaceful use of nuclear energy
- **Objective 15:** Harness the atom to safely, reliably, and affordably power a global fleet that enables unrivaled responsiveness, endurance, stealth, and warfighting capability
- **Objective 16:** Advance equity in DOE's procurement, funding, R&D, and D&D processes and activities
- **Objective 17:** Increase access to affordable, sustainable, and reliable energy for disadvantaged communities
- **Objective 18:** Ensure 40 percent of the overall benefits of relevant federal investments are delivered to disadvantaged communities
- **Objective 19:** Support economic development, including through clean economy opportunities for workers in communities and industries in transition
- **Objective 20:** Enhance engagement and energy economic development opportunities in tribal communities
- **Objective 21:** Support diversity and equity among researchers, projects, entrepreneurs, and the National Laboratories
- **Objective 22:** Support environmental remediation

- **Objective 23:** Attract, manage, train, and retain the best federal workforce to meet future mission needs
- **Objective 24:** Use taxpayer funds efficiently and improve visibility into how funds are being used
- **Objective 25:** Monitor Departmental performance to ensure that program activities are executed in a safe and secure manner consistent with Departmental direction
- **N/A** – Strategic Objective was not selected as an objective in the previous field.

Inherent Risk Rating: Inherent risk is the exposure arising from a risk before any action is taken to manage it. Because the Inherent Risk Rating is the assessment of a risk before any action to manage or mitigate the risk through the use of controls, the Inherent Risk Rating will **never be lower** than the Residual Risk Rating. Inherent risk is measured using the impact and likelihood metrics described below.

Inherent Impact (Column H): Inherent Impact refers to the measurements of the effect of an event that could result from the occurrence of the identified risk. The impact is assessed to gauge how severe the effect will be on the ability to achieve an organization's goals and objectives. Assess this by estimating the level of impact, using a scale of 1 to 5, which will happen if the risk occurs. Use informed judgment and the experience of knowledgeable individuals and groups to assist in determining the level of impact. In this assessment, consider these questions:

- Is there a threat to human life?
- Is there a threat of fraud, waste, and abuse?

Use the scale with defined parameters in [Table 5 Impact Assessment](#), to rate the impact of the risk.

Table 5 Impact Assessment

Measured Impact	Reduced Quality and Performance
1 – Very Low	The impact is insignificant and localized and does not affect the entity's ability to achieve one or more of its objectives or performance goals. Impact on single non-critical task/objective resulting in minor plan/work adjustment with no impact on achieving project/organizational goals/deliverables, e.g., data for a report provided late but ultimate deadline met.
2 – Low	The impact will not significantly affect the entity's ability to achieve one or more of its objectives or performance goals. Impact on multiple non-critical plan tasks/objectives resulting in several minor plan/work adjustments with no significant impact on achieving project/organizational goals/deliverables, e.g., data provided fails data checks and data accumulations system/process must be corrected and rerun resulting in delays.
3 – Moderate	The impact could significantly affect the entity's ability to achieve one or more of its objectives or performance goals. Impact on one or more critical plan tasks/objectives resulting in major plan/work adjustments with significant impact resulting in reduced achievement of project/organizational goals/deliverables, e.g., expected data unavailable and final report/product lacks expected information/analysis or results in significant delivery delay.
4 – High	The impact could preclude or highly impair the entity's ability to achieve one or more of its objectives or performance goals. Impact on one or more critical plan tasks/objectives resulting in major plan/work adjustments with major impact resulting in only partial achievement of project/organizational goals/deliverables, e.g., expected data unavailable and final report/product lacks critical information/analysis and/or results in significant delays.
5 – Very High	The impact will likely preclude the entity's ability to achieve one or more of its objectives or performance goals. Impact on one or more critical plan tasks/objectives resulting in major plan/work adjustments with severe impact resulting in failure to achieve project/organizational goals/deliverables, e.g., expected data unavailable and final report/product not issued.

Inherent Likelihood (Column I): This is the probability that a given event will occur. Assess the likelihood (using a scale of 1 to 5) based on data (when available) or the knowledge and experience of an expert or group. Use the scale with defined parameters in [Table 6 Likelihood](#) to rate the likelihood of the identified risk:

Table 6 Likelihood

Likelihood	Definition
1 – Very Low	Risk event rarely to occur. Less than a 5% chance of occurrence.
2 – Low	Risk event unlikely to occur. Between a 5% - 25% chance of occurrence.
3 – Moderate	Risk event possible to occur. Between a 26% - 49% chance of occurrence.
4 – High	Risk event highly likely to occur. Between a 50% - 74% chance of occurrence.
5 – Very High	Risk event almost certain to occur. Greater than a 75% chance of occurrence.

Current Strategy (Column J): Use this column to indicate the action currently taken to manage the identified risk. Consider these questions when preparing a risk response:

- What action or multiple actions will be taken to address this risk?
- How are these actions managing the risk?
- How long will these actions continue?

Select a current risk response from the options in the drop-down menu. (See [Table 7 Risk Responses](#))

Table 7 Risk Responses

Response Type	Definition	Example
Accept	Take no action to respond to the risk based on insignificance of risk, requirement to complete the work, or benefits and opportunities exceed the risk.	Continue an environmental cleanup project, despite identified risks, because taking no action has unacceptable public safety and environmental impacts.
Avoid	Action is taken to stop the operational process, or the part of the operational process, causing the risk.	Supplier of a specialty part may no longer be in business when part is needed, so action is taken to modify the design specifications to use generic, widely available part.
Reduce	Take action to reduce the likelihood or impact of the risk.	Past end-of-life infrastructure needs replacement, but increased inspection and extraordinary maintenance reduces risk of catastrophic failure.
Transfer	Take action to transfer the responsibility for ownership and handling the risk to an organization other than the current entity that owns the risk.	Scope of work on a project is transferred to another organization with more expertise or experience.
Share	Take action to share the risk with another entity within the organization or with one or more external parties.	Strategic partnership formed to share high risk work with an outside organization with expertise and special facilities.

In developing the Risk Profile, management must determine those risks for which the appropriate response includes implementation of formal internal controls activities according to defined criteria, as described in Section III of OMB Circular A-123 and which conforms to the standards published by GAO in

the Green Book. Note that to the extent internal controls are necessary to manage or mitigate risks identified in Risk Profiles, the controls must be established and tested as part of the annual internal control testing cycle and included as part of the attestation in the annual assurance memorandum.

Current Actions/Controls (Column K): This column provides a narrative explanation of how to currently apply the risk response identified in the prior column. Include any formal internal control activities that are currently in place to manage the risk. The brief narrative should also summarize the **action** taken, and as applicable, may include an explanation of the action. For example, the action to address a safety risk might involve repair of faulty equipment, so the selection “reduce” from the risk response strategy drop-down menu is appropriate and then explain in this text box how the faulty equipment was repaired to reduce the risk. Also, the narrative should explain the **controls** put in place to reduce the risk. Using the same example above, explain how regular safety inspections were implemented.

Transfer/Share Organization (Column L): If the Current Strategy is to “Transfer” or “Share,” then this field should be used to identify the organization to which the risk is transferred or shared. Organizations will need to coordinate with the identified organization to which the risk ownership is transferred to or shared with to ensure that the risk is included on the identified organization’s risk profile as well. The inclusion of the risk on the identified organization’s risk profile will not only indicate that they accept the transfer or sharing of risk ownership but will also close the gap on the actions taken to respond to the risk. If the Current Strategy is other than “Transfer” or “Share,” then “N/A” should be selected in this field. However, if the Current Strategy in column J is “Transfer” or “Share,” then select the organization the risk is being transferred to or the risk is being shared with. Note that if an organization does not identify the Transfer/Share Organization in this column (only for risks with a transfer or share risk response) or select “N/A” when applicable, an error will occur in the validation column (Column U).

Current Evaluation Category (Column M): Use this column to indicate where the internal control activities to manage the risk have been evaluated. If the risk is a financial risk, and the appropriate internal controls are tested and documented in the entities' FMA Module in AMERICA, select “FMA Evaluation” from the drop-down menu. If the risk is a non-financial risk, and the controls to manage this risk are evaluated in the Entity Assessment's Entity Objective Evaluation, select this option from the drop-down menu. If the internal control activities to address the risk are evaluated in the Entity Assessment's Internal Control Evaluation, then select this choice from the available options. If formal internal control activities were not implemented to manage the risk (i.e., the current strategy is to “Accept”), then this column should be left blank.

Current Evaluation Details (Column N): This column provides text space to provide further detail of where the risk is currently evaluated. For example, if the current evaluation category is “Internal Control Evaluation”, indicate which of the 17 Principles the risk is evaluated. If the current evaluation category is “Entity Objectives Evaluation”, identify which entity objective. If the current evaluation category is “FMA Evaluation”, identify the sub-process where the controls are located that mitigate the risk.

Residual Risk Rating: Residual risk is the amount of risk that remains after action has been taken to manage it. In the earlier example about safety, after implementation of safety inspections, residual risk from the limitations of testing equipment may remain. Use the same assessment standards provided in the prior section to assess residual risk impact and likelihood on a scale of 1 to 5 ([Table 5 Impact Assessment](#) and [Table 6 Likelihood](#), respectively). Because the Residual Risk Rating is the assessment of a risk after actions have been implemented to manage or mitigate the risk, the Residual Risk Rating will **never be higher** than the Inherent Risk Rating. However, if no actions were taken to address the

inherent risk or if the Current Risk Response strategy is “Accept”, then the residual risk field will be the same as the inherent risk.

Residual Impact (Column O): This column refers to the measurement of the effect of an event that could result from the occurrence of the identified residual risk. The impact is assessed to gauge how severe the effect will be. Assess this by estimating the level of impact that will happen if the event occurs based on informed judgment and experience of knowledgeable individuals and groups on a scale of 1 to 5 (using the scale in [Table 5 Impact Assessment](#)). For risks where no actions were taken to address the inherent risk, then the residual risk impact field will be the same.

Residual Likelihood (Column P): This is the probability that a given event will occur. This assessment is used to gauge how likely an event is to occur. For example, events that may happen every day have a far greater likelihood than events that may only happen once in 10 years. Assess the likelihood (using a scale of 1 to 5) based on data available or use the knowledge and experience of an expert or group using the scale in [Table 6 Likelihood](#). For risks where no actions were taken to address the inherent risk, then the residual risk likelihood field will be the same.

Proposed Risk Response Strategy (Column Q): This column indicates proposals on how to treat the residual risk similar to the consideration of the inherent risk discussed above. Consider these questions when preparing a proposed risk response:

- What additional actions would address this risk in addition to the initial risk mitigation actions already taken?
- Would these actions actually manage the risk?
- How long will the actions continue?

Select a proposed residual risk strategy from the options found in [Table 7 Risk Responses](#). For risks where no actions were taken to address the inherent or residual risk, the proposed risk response may be blank.

Proposed Additional Actions (Column R): Use this column to provide a narrative explanation of how to employ the proposed risk response to the residual risk identified in the prior column. These additional actions could further reduce the exposure remaining after the initial risk mitigation actions have been taken. The amount and type of description in this column is subjective, but a brief summary is recommended. Proposed risk responses should use the same standards applied to the current risk response, as described above, including the identification of risks for which implementation of formal internal control activities is appropriate. This column is also to be used to explain why it is appropriate to accept the residual risk, if that is the decision.

Proposed Implementation Category (Column S): Identify the management process that will be used to implement, test, and monitor proposed actions. Select one of the following three options as the relevant management process: (1) Strategic Review; (2) Budget Formulation Process; or (3) Internal Control Assessment.

Risk Owner POC (Column T): In this column, provide the name of the person accountable for implementing risk response(s) and ensuring that risk mitigation plans are developed and implemented. For cross-cutting risks involving multiple programs across organizations, use the lead coordinator of the risk response. This person also will identify or monitor mitigating controls, if applicable.

Validation (Column U): This is an automatically calculated column and requires no input. This column will identify if a selection was not made where it is required, or if a wrong combination of selections was made. Review this column prior to submission and getting approval to ensure the accuracy of the Risk Profile.

Table 8 Possible Validation Errors

Possible Validation Errors
▪ If a selection was not made in the <i>Fraud Impact</i> column (Column E) from the dropdown menu.
▪ If a <i>Strategic Objective at Risk</i> (Column G) is applicable and missing.
▪ If <i>Operations Objectives</i> , <i>Reporting Objectives</i> , or <i>Compliance Objectives</i> is selected for Identification of Objectives (Column F) and "N/A - <i>Strategic Objective was not selected as an objective in the previous field</i> " is not selected for <i>Strategic Objective at Risk</i> (Column G).
▪ If a <i>Transfer/ Share Organization</i> (Column L) is applicable and missing.
▪ If <i>Accept</i> , <i>Avoid</i> , or <i>Reduce</i> is selected for <i>Current Strategy</i> (Column J) and "N/A" is not selected for <i>Transfer/ Share Organization</i> (Column L).
▪ If <i>Inherent Risk Rating for Impact</i> and <i>Likelihood</i> (Column H & I) are blank.
▪ If the <i>Residual Risk Impact</i> and/or <i>Likelihood</i> values are greater than the <i>Inherent Risk Impact</i> and/or <i>Likelihood</i> values. For example, if the <i>Inherent Risk Rating</i> is 4 for <i>Impact</i> and 4 for <i>Likelihood</i> , and the current strategy is to reduce the risk, then selecting a <i>Residual Risk Impact</i> or <i>Likelihood</i> rating of 5 should not occur.

Residual Risk Score (Column V): This column automatically calculates the residual risk score for each identified risk by multiplying the risk's residual impact (Column O) by the residual likelihood (Column P). A score of 25 reflects the highest possible residual risk rating (5 x 5) and a score of 1 reflects the lowest possible residual risk rating (1 x 1).

III-A-4. Risk Profile Memorandum Template

Format for Headquarters and Under Secretaries Risk Profile Memorandum



Department of Energy
Washington, DC 20585

Date

MEMORANDUM FOR THE OFFICE OF THE CHIEF FINANCIAL OFFICER

FROM: [Head of HQ/Under Secretary Element's Name], [Head of HQ/Under Secretary Element's Title]

SUBJECT: FY 2023 Risk Profile

Risk Profile:

[Insert HQ/Under Secretary Element Name] reviewed the risks that were submitted in the FY 2022 Risk Profile impacting the organization and determined there are no substantive changes or updates to report for the FY 2023 Risk Profile.

In addition, reporting from Field Offices, Site Offices, M&O and non-M&O Contractors was considered as part of our review [if applicable]. Therefore, this memorandum serves as positive confirmation that there are no changes to the [Insert HQ/Under Secretary Element Name] FY 2023 Risk Profile.

IV. Appendix B, Fraud Risk Management Guidance

A. Purpose and Background

Fraud poses a risk to the integrity of Federal programs and can erode public trust in government. Effective fraud risk management helps to make sure that the Department's services are fulfilling intended purposes, funds are spent effectively, and assets are safeguarded. In FY 2023, DOE continues to place emphasis on fraud prevention, detection, and mitigation to decrease fraud and to comply with the *Payment Integrity Information Act of 2019* (PIIA). PIIA indicates that the guidelines required to be established under section 3(a) of the *Fraud Reduction and Data Analytics Act* (FRDAA) shall continue to be in effect on or after the date of enactment of PIIA, which requires agencies to:

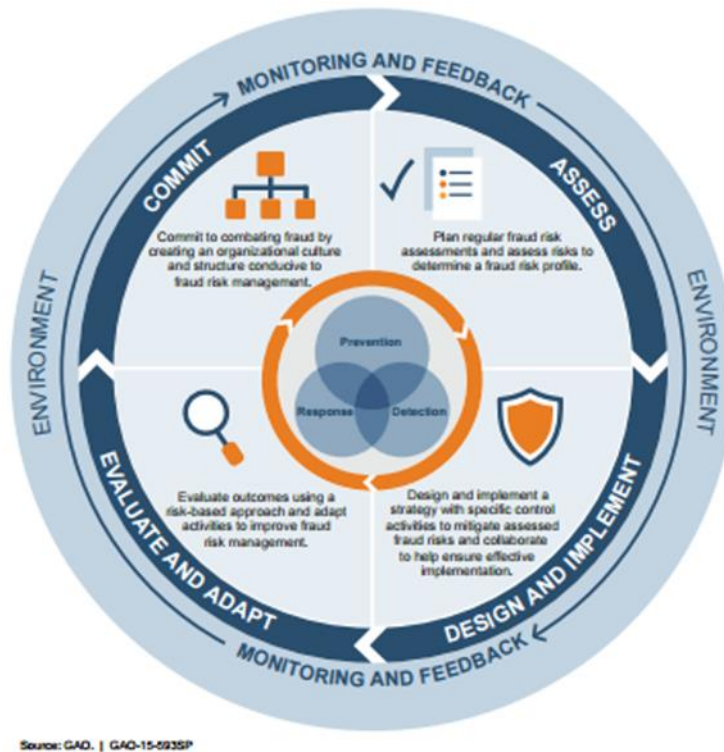
- Conduct an evaluation of fraud risks using a risk-based approach to design and implement control activities to mitigate identified fraud risks;
- Collect and analyze data from reporting mechanisms on detected fraud to monitor fraud trends and use that data and information to continuously improve fraud prevention controls; and,
- Use the results of monitoring, evaluations, audits, and investigations to improve fraud prevention, detection, and response.

B. GAO Fraud Framework

To help combat fraud and preserve integrity in government agencies and programs, GAO identified leading practices for managing fraud risks in its GAO-15-593SP, GAO's *A Framework for Managing Fraud Risks in Federal Programs* (Fraud Framework). The Fraud Framework encompasses control activities to prevent, detect, and respond to fraud, with an emphasis on prevention, and highlights opportunities for federal managers to take a more strategic, risk-based approach to managing fraud risks and developing effective antifraud controls. The Fraud Framework describes leading practices for establishing an organizational structure and culture that are conducive to fraud risk management, designing and implementing controls to prevent and detect potential fraud, and monitoring and evaluating to provide assurances to managers that they are effectively preventing, detecting, and responding to potential fraud.

DOE reporting organizations should adhere to the leading practices in the GAO Fraud Framework as part of the efforts to effectively design, implement, and operate an internal control system that addresses fraud risks. OMB Circular A-123 establishes that managers are responsible for determining the extent to which the leading practices in the GAO Fraud Framework are relevant to the program and for tailoring the practices, as appropriate, to align with program operations. To help combat fraud and preserve integrity, Managers should adhere to the leading practices that GAO identified, as part of the efforts to effectively design, implement, and operate an internal control system that addresses fraud risks. For details on the GAO Fraud Framework, refer to [GAO-15-593SP](#), *A Framework for Managing Fraud Risks in Federal Programs*.

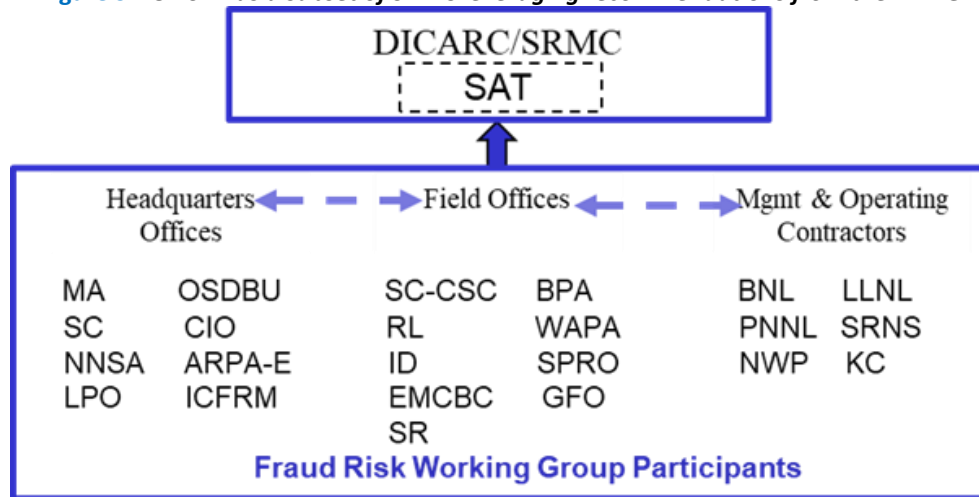
Figure 8 GAO Fraud Risk Framework and Select Leading Practices



C. DOE Fraud Risk & Data Analytics Framework

In FY 2023, DOE will continue implementing a fraud risk framework over the next several years using a three-phased approach. Phase I adjusted the roles and responsibilities of the Departmental Internal Control and Assessment Review Council (DICARC) to perform additional duties as the Senior Risk Management Council (SRMC), established the SAT and identified the use of data analytics across DOE. Phase II focuses on evaluating fraud risk occurrences across DOE along with preparing and providing direction on DOE's anti-fraud strategy. Phase III will continue to mature and monitor DOE's fraud risk framework. The SAT will lead the effort for implementing DOE's Fraud Risk Framework based on recommendations from the FRWG (Figure 9) and the DAWG.

Figure 9 DOE SAT as a subset of SRMC leveraging recommendations from the FRWG



In response to recent legislation, *Infrastructure Investment and Jobs Act (Infrastructure Bill)*, *Inflation Reduction Act (IRA)*, and *CHIPS and Science Act*, OCFO is establishing and formalizing a Department-wide data analytics program that is cross-cutting with participation from field offices to form the DAWG. To support formalizing a Department-wide data analytics program, a data call took place in FY 2023 to identify key gaps in areas where we should establish collaborative forums to efficiently strategize an analytics approach. It will also demonstrate progress to GAO and OIG that DOE is aligning with best practices. In addition, the data analytics program will leverage Subject Matter Expert (SME) expertise throughout the Department while **not** being prescriptive on how to perform analytics because it will build on existing efforts and work.



The data call will collect an inventory of analytics activities currently performed across the Department in six risk areas that have a high potential of fraudulent activities as prioritized by the OIG and DICARC/SRMC. Those potential risk areas include:

1. Rebates
2. Grant/Cooperative Agreements
3. Loans
4. Cybersecurity (includes labs and M&O Contractors)
5. Labor charging – Federal and Contractor (Includes labs and contractors)
6. Materials and Service – Contract and Project Management (Includes labs and contractors)

After the DAWG analyzes the data, the results will be reconciled to the Department’s Fraud Risk Register to identify potential gaps.

D. Fraud Considerations in the Risk Profile

Management has overall responsibility for establishing internal controls to manage the risk of fraud. When developing the FY 2023 Risk Profile, organizations must consider the potential for fraud and should follow the guidance set forth by the GAO Fraud Framework and GAO Green Book.

In FY 2023, reporting organizations must continue to identify the top financial and non-financial fraud risks in the Risk Profile. These ongoing fraud risk statements must be included in each entity’s Risk Profile deliverable along with other identified risks. **Organizations must identify each risk with financial or nonfinancial fraud impact by completing the *Fraud Impact* column (Column E) in the Risk Profile template.** Organizations will select from a drop-down menu identifying whether a risk is a **financial fraud, non-financial fraud, top financial fraud, or top non-financial fraud**. If a risk does not have a financial or nonfinancial fraud implication, organizations will select *N/A*, from the drop-down menu selection. While financial fraud risks are often well known, there can be difficulties in identifying non-financial fraud risks. Examples of potential non-financial fraud risks are included below:

- Theft of PII or classified information
- False claims or false statements (For example, a contractor makes false statements to win a bid, an employee provides false statements to be hired, or a grantee provides false claims to be awarded a grant)
- Employees pressured to issue knowingly incorrect non-financial data/reports
- Product substitution or counterfeit parts (For example, a subcontractor fraudulently provides the wrong parts or parts of a lesser material)
- Employee sabotage or employee vandalism³

³ Black’s Law Dictionary defines vandalism as mindless and malicious harm and injury to another’s property.

E. Fraud Considerations in the FMA and EA Reviews

DOE maintains an emphasis on fraud prevention in the Financial Management Assessment (FMA) Module within AMERICA to further increase fraud prevention activities across the Department. Entities should continue to review controls to determine if a fraud and/or improper payments risk is mitigated. Any controls that mitigate a fraud and/or improper payments risk should be designated as such in the FMA Module Assessment tab by **selecting the appropriate designation from the *Fraud/ Improper Payments* dropdown option for controls. Entities should also continue to improve data integrity by removing all *Fraud/ Improper Payment* selections from the *Control Category* field and identify from the dropdown menu whether the control is *Business, Compliance, Performance, or Information Technology*.** Reporting organizations that continue to have a *Fraud/Improper Payment* selection in the *Control Category* field will be notified in the 2nd quarter to update the selection. Also, if a control is designed to mitigate a fraud and/ or improper payment risk and the control fails testing, or fails related to the detection of potential fraud, the organization will promptly notify their assigned OCFO Analyst on the control failure and the remediation plan to confirm a control is designed and operating effectively to mitigate the risk.



In FY 2023, fifty-eight (58) corporate risks have been added to the FMA Module within AMERICA. The 58 corporate risks are financial related fraud risks that are linked to the Department's Fraud Risk Register and are mapped to risks in the Department's Fraud Risk Profile. Reporting organizations should identify relevant risks, perform risk assessments, and identify controls to mitigate the newly added corporate risks.



To sustain increased fraud prevention activities across the Department, emphasis remains in this area in the EA Module. In the Entity Objective Evaluation tab, organizations must evaluate the Fraud Prevention entity objective. This evaluation is in addition to the assessment of fraud risk under the GAO Green Book Principle #8, "management should consider the potential for fraud when identifying, analyzing, and responding to risks," in the Internal Controls Evaluation tab. The Fraud Prevention entity objective has several considerations that should be evaluated by reporting organizations.

1. *Top financial and top non-financial fraud risks* - organizations must identify the top financial and non-financial fraud risks. The top fraud risks identified in an entity's EA Module should be consistent with the fraud risks included in the FY 2023 Risk Profile deliverable.
2. *Fraud risk factors* - entities should consider the fraud risk factors from the GAO Green Book. While the following fraud risk factors don't necessarily indicate that fraud exists, they are often present when fraud occurs.
 - Incentive/Pressure: management or other personnel have an incentive or are under pressure, which provides a motive to commit fraud
 - Opportunity: circumstances exist, such as the absence of controls, ineffective controls, or the ability of management to override controls, that provide an opportunity to commit fraud
 - Attitude/Rationalization: individuals involved are able to rationalize committing fraud
3. *Fraud mitigation controls for identified fraud risks* – organizations should determine if controls are in place to mitigate identified fraud risks. For controls reported in the FMA Module that manage a fraud risk, organizations should assign a fraud and/or improper payments control type.
4. *Management's commitment to reporting fraud* – entities should evaluate whether the organization is encouraging the reporting of suspected fraud to the DOE OIG in accordance with DOE Order 221.1B, "Reporting Fraud, Waste and Abuse to the Office of Inspector General."
5. *Additional potential areas of fraud risk* – organizations should specifically consider potential fraud risks in the following areas that are more susceptible to fraud at DOE:

- Rebates
- Grant/Cooperative Agreements
- Loans
- Cybersecurity
- Labor charging
- Materials and Service



Entities that complete an FMA Module should assess and evaluate the potential fraud risks in the FMA. Organizations that are not required to complete an FMA Module should list mitigating control activities in their EA Module.

F. Fraud Trends Across the Department

The Department continues efforts to combat and prevent fraud, waste, and abuse. One particular fraud risk that continues to emerge as a threat to the Department is business email compromise (BEC). BECs involve the impersonation of legitimate DOE personnel or vendors to request changes in the payment information in order to route Department funds to a fraudulent bank account. Fraudsters use information available online to impersonate a legitimate Department vendor/employee, create a spoofed email address similar to the legitimate vendor/employee email address, and then send an email to a DOE entity requesting a change in banking information.

BEC fraudulent activities continue to adversely impact the Department and Government as a whole. Reporting organizations should review the *Business Email Compromise Checklist* on the final page of this appendix. The checklist contains immediate actions in the event of a BEC, as well as potential controls for prevention and recognition. Reporting organizations should consider the risk of business email compromise fraud and establish or enhance controls to manage the risk as warranted.

The Government Accountability Office (GAO) has identified nine fraud scheme categories in recent audits that may impact the Department of Energy. Reporting organizations should consider the actions they are taking to mitigate the potential risks of these fraud schemes from occurring. The fraud schemes are found in [Table 9](#).

Table 9 GAO Contracting Fraud Schemes Categories⁴

Bid Rigging	Payroll Schemes	Kickback and Gratuities
Conflicts of Interests	Misrepresentation of Eligibility	Theft
Product Quality	Contract Progress Schemes	Billing Schemes

The DOE OIG also identified common fraud schemes that entities should consider:

- Non-Deliverables – where a recipient fails to produce what is required from the statement of work or the grants/contract is closed out without holding the recipient/contractor accountable.
- Bid Rigging or Collusion – two or more contractors/subcontractors/grantees work together and attempt to extort the Department of funds.
- Fraud in the Inducement – when a grantee lies about their capabilities in order to receive Department funding.
- Ghost Employees – paying government funds to employees that don't exist.
- Fictitious Invoices/Laundering – fake companies send fictitious bills to the prime contractors/grantee for reimbursement.

⁴ The definitions are found in the Glossary.

- Kickbacks/ Bribes/ Extortion/ Conflict of Interest by Federal officials in the award and administration of grants/ contracts.
- Foreign Corrupt Practices on the part of U.S. or foreign officials.

There has been a rise of vulnerability to BEC and targeted phishing on most remote and teleworkers. The following should be considered to avoid becoming a victim to these common fraud schemes:

- Use DOE equipment for DOE business only - Do not connect unauthorized devices, e.g., smartphones and USB devices, to your DOE equipment.
- Update your work devices - Check that your devices and software are up to date.
- Communicate your working hours - Establish and disclose your hours of availability for your team's awareness.
- Observe your surroundings - Avoid having sensitive work-related conversations in public areas.
- Encrypt email messages containing sensitive information - Ensure your online activities are encrypted and use telework capabilities provided.
- Avoid leaving DOE equipment unattended at any time - Lock your screen when walking away and store your work device in a secure location.
- Practice good phishing hygiene - Avoid clicking on suspicious links and attachments from unsolicited emails.
- Be cautious of unfamiliar e-mails.

G. Fraud Communication Requirements

DOE internal controls reporting organizations are expected to report allegations and actual instances of fraud, waste, abuse, corruption, criminal acts, or mismanagement related to DOE programs to the Department's Office of the Inspector General (OIG) in accordance with DOE Order 221.1B. The DOE OIG is responsible for investigating any fraudulent acts involving DOE, contractors or subcontractors, or any crime affecting the programs, operations, Government funds, or employees of those entities. Entities can report suspected or actual fraud to the OIG anonymously and confidentially through the OIG Hotline⁵. **Organizations should report allegations of suspected or actual fraud promptly to the Department OIG.**

⁵ Contact OIG Hotline via email: ighotline@hq.doe.gov or phone: (202) 586-4073, toll free: (800) 541-1625, and fax: FAX: (202) 586-4902.

A webform may also be filled out using the following web address: <https://www.energy.gov/ig/complaint-form>.

V. Appendix C, Internal Controls Evaluations Guidance

A. Purpose and Background

Internal control requirements are codified in the *Federal Managers' Financial Integrity Act of 1982* (FMFIA). The Act requires the Comptroller General of the Government Accountability Office (GAO) to establish internal control standards and the Director of the Office of Management and Budget (OMB), to establish guidelines for agency evaluation of systems of internal control to determine such systems' compliance with the requirements. The GAO established formal standards in the *Standards for Internal Control in the Federal Government* (Green Book), and OMB established guidelines for evaluation in OMB Circular A-123 (A-123), *Management's Responsibility for Enterprise Risk Management and Internal Control*.

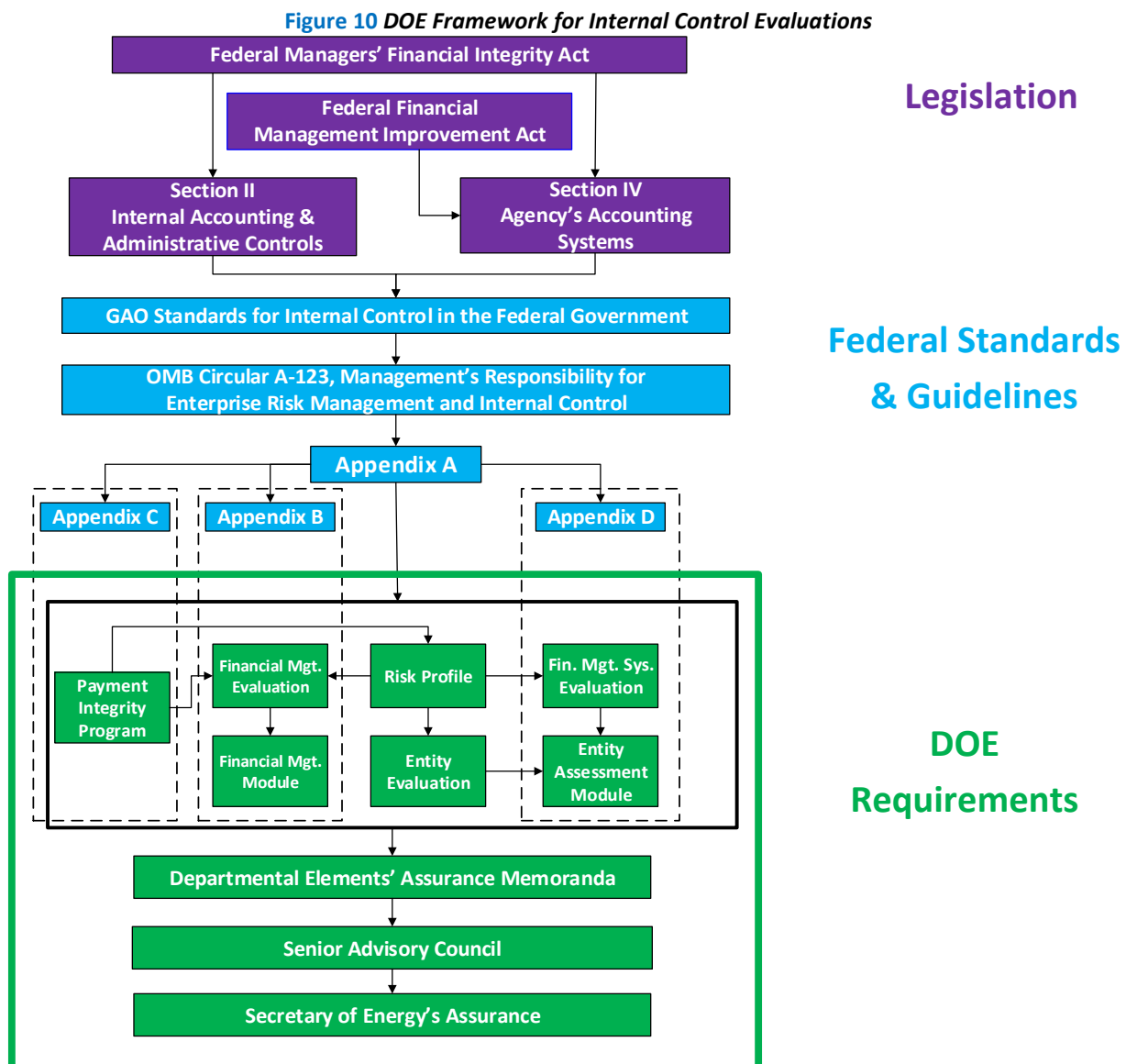
This guidance establishes the Department of Energy's (DOE) Internal Control Program requirements for evaluating and reporting on internal controls in accordance with A-123.

FMFIA requires each agency to:

- Establish and maintain an internal control system, and report on the overall adequacy and effectiveness of internal control systems. Internal control systems should provide: 1) obligations and costs to be recorded in compliance with applicable laws; 2) funds, property, and other assets to be safeguarded; and 3) revenues and expenditures applicable to agency operations to be properly recorded and accounted for to provide reliable financial reporting and to maintain accountability over the assets;
- Evaluate financial management systems to determine compliance with government-wide requirements mandated by Section 803(a) of the *Federal Financial Management Improvement Act* (FFMIA), and to take corrective actions if systems are non-compliant; and,
- Provide an annual assurance statement signed by the head of the agency reporting on the overall adequacy and effectiveness of internal controls related to operations, reporting, and compliance; identified material weaknesses; and whether the agency's financial management systems are in compliance with FFMIA.⁶

⁶ Agency requirements mandated by Federal Managers' Financial Integrity Act of 1982.

Figure 10 presents the DOE framework for internal control evaluations. The DOE activities (in green) meet statutory requirements (in purple) and Federal Government guidance (in blue).



B. OMB Circular A-123

OMB Circular, A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, requires the:

- Establishment and maintenance of internal controls to achieve objectives related to operations, reporting and compliance;
- Evaluation of the effectiveness of DOE internal controls in accordance with the GAO Green Book; and,
- Annual reporting of overall adequacy and effectiveness of DOE internal controls related to operations, reporting, and compliance, and compliance of financial management systems with government-wide requirements.

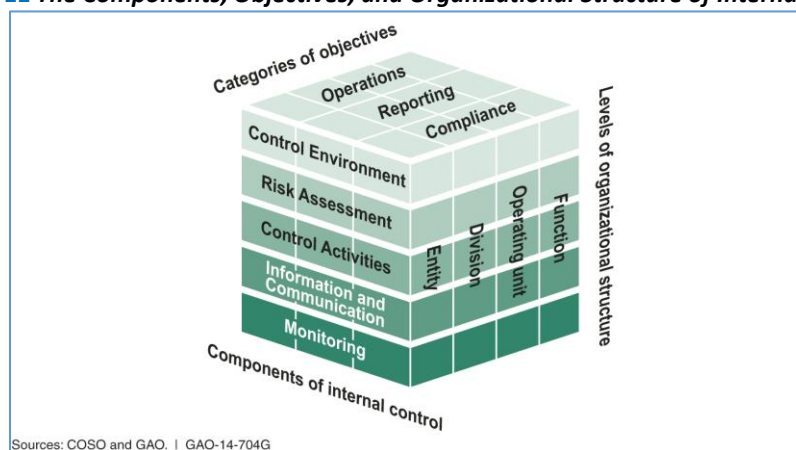
C. GAO Standards for Internal Control

The GAO's *Standards for Internal Control in the Federal Government* (Green Book) provides criteria for designing, implementing, and operating an effective internal control system, and through the use of components and principles, establishes standards for internal control. Internal control in an organization provides reasonable, not absolute, assurance that the organization will achieve objectives related to operations, reporting, and compliance.

Using the standards and guidance provided in the Green Book, an organization can design, implement, and operate internal controls to achieve objectives related to operations, reporting, and compliance.

The five components of internal control are: Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring. There are 17 principles which support the effective design, implementation, and operation of the five components and represent requirements necessary to establish an effective internal control system.

Figure 11 *The Components, Objectives, and Organizational Structure of Internal Control*



The columns labeled on the top of the cube represents the three categories of an entity's objectives. The rows represent the five components of internal control. The levels of organizational structure represent the third dimension of the cube. Each component of internal control applies to the three categories of objectives and the organizational structure.

E. Shifting from Low-Value to High-Value Work

DOE continues to streamline operations and incorporate flexibility for the components, complementing broader Government-wide efforts to shift resources to high-value work. Consistent with this effort, the Internal Controls Evaluation Working Group concluded its three-year pilot assessment to evaluate alternative control test cycle approaches. Four labs, Lawrence Berkely National Lab (LBNL), Lawrence Livermore National Lab (LLNL), Stanford Linear Accelerator Lab (SLAC), and Sandia National Lab (SNL) piloted alternative control test cycle approaches – including both data analytics and business process approaches – as part of the DOE Financial Management Assessment (FMA). The Internal Controls Evaluation Working Group, consisting of several Field Offices and PMAs across the complex, have recommended a hybrid approach as the control test cycle approach for FMA assessments.



DOE's Internal Control Program will begin preparing for the hybrid approach with early adoption by reporting organizations, as desired, beginning in FY 2023 and full implementation by reporting organizations in FY 2025. A briefing on the pilot program and the hybrid approach will occur towards the end of the Quarter 2, FY 2023. The hybrid approach allows reporting organizations to elect which



approach, data analytics or business process, their organization will use based on providing the most effective and efficient oversight and use of resources.

Reporting organizations that elect the business process approach are expected to incorporate data analytics approach into their FMA assessments as the organizations Internal Control Program continues to mature. Reporting organizations must determine which approach, data analytics or business process, they will employ and inform the Internal Controls and Fraud Risk Management Division of their decision by September 7, 2023. Reporting organizations will also provide their implementation plan during Quarter 1, FY 2024. Reporting organizations will e-mail their decision on the elected approach and their implementation plan to ICFRMD's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV.

F. Key Internal Control Requirements

This appendix provides the FY 2023 Internal Control requirements for:

- Financial Management Assessment Evaluations (FMA Module);
- Entity Assessment Evaluations (EA Module);
- Financial Management Systems Evaluations (FMS Tab within the EA Module);
- Interim Internal Controls Status (IICS Module); and,
- Assurance Memoranda.

Table 10 provides the DOE Internal Control requirements for each entity. While DOE does not require every organization to provide Internal Control deliverables to the OCFO, organizations should check with respective Headquarter Offices to determine if a deliverable is needed by the cognizant organization. A brief synopsis for organizations at each level within a reporting hierarchy are:

- Departmental Elements (Headquarters and Field Offices) are responsible for considering internal control evaluation results of Major/ Integrated Contractors, **including both Management and Operating (M&O) and integrated non-M&O Contractors**;⁷
- Small Departmental Elements are not required to perform FMA evaluations. These Elements must complete the five peripheral entity objectives in the EA Module. (Small Departmental Elements are identified in **Table 10**);
- Site Offices⁸ are not required to provide an EA deliverable to the OCFO and should check with the cognizant Field and Headquarters Offices to determine if an EA deliverable is required to either cognizant organization; and,
- Major/ Integrated Contractors, **including both M&O and integrated non-M&O Contractors**, are required to provide a Risk Profile to the cognizant Field Office and are not required to provide the Risk Profile to the OCFO.
- Reporting organizations that are required to provide Risk Profiles will refer to *Appendix A, Risk Profile Guidance for Risk Profile FMA and EA Module Reporting*.

⁷ Major/ Integrated Contractors are DOE contractors with responsibility for the management and/or operation of a Department-owned or leased facility.

⁸ The site offices are Kansas City, Livermore, Los Alamos, Nevada, NNSA Production, Sandia, Ames, Argonne, Brookhaven, Fermi, Bay Area, Princeton, Oak Ridge, Pacific Northwest, and Thomas Jefferson.

Table 10 Listing of Required Internal Control Evaluations⁹ due to OCFO by Organization

Departmental Elements & Reporting Organizations		FMA Evaluation	Entity Evaluation	FMS	Interim Internal Control Status	Assurance Memorandum
Under Secretary Offices	Office of the Under Secretary for Infrastructure (S3)					✓
	Office of the Under Secretary for Science and Innovation (S4)					✓
	Office of the Under Secretary for Nuclear Security and National Nuclear Security Administration (S5)					✓
Independent Agency	Federal Energy Regulatory Commission					✓
Headquarters Offices	Advanced Research Projects Agency-Energy	✓	✓	✓	✓	✓
	Office of Clean Energy Demonstrations	✓	✓	✓	✓	✓
	Office of the Chief Financial Officer	✓	✓	✓	✓	✓
	Office of the Chief Information Officer	✓	✓	✓	✓	✓
	Cybersecurity, Energy Security & Emergency Response	✓	✓	✓	✓	✓
	Office of Electricity	✓	✓	✓	✓	✓
	Energy Efficiency and Renewable Energy	✓	✓	✓	✓	✓
	Environment, Health, Safety and Security	✓	✓	✓	✓	✓
	Environmental Management	✓	✓	✓	✓	✓
	Fossil Energy and Carbon Management	✓	✓	✓	✓	✓
	Human Capital Officer	✓	✓	✓	✓	✓
	Inspector General		✓		✓	✓
	Joint Office of Energy and Transportation	✓	✓	✓	✓	✓
	Legacy Management	✓	✓	✓	✓	✓
	Loan Programs Office	✓	✓	✓	✓	✓
	Management	✓	✓	✓	✓	✓
	National Nuclear Security Administration	✓	✓	✓	✓	✓
	Nuclear Energy	✓	✓	✓	✓	✓
	Project Management	✓	✓	✓	✓	✓
	Science	✓	✓	✓	✓	✓
	Office of Clean Energy Demonstrations*	✓	✓	✓	✓	✓
	Office of Federal Energy Management Programs*	✓	✓	✓	✓	✓
	Grid Deployment Office*	✓	✓	✓	✓	✓
	Office of Manufacturing & Energy Supply Chains*	✓	✓	✓	✓	✓
	Office of State and Community Energy Programs*	✓	✓	✓	✓	✓
Small Headquarters Offices	Arctic Energy		✓		✓	✓
	Artificial Intelligence & Technology		✓			✓
	Congressional and Intergovernmental Affairs		✓		✓	✓
	Economic Impact and Diversity				✓	✓
	Energy Information Administration		✓		✓	✓
	Office of Policy		✓		✓	✓
	Enterprise Assessments		✓		✓	✓
	General Counsel		✓		✓	✓
	Hearing and Appeals		✓		✓	✓
	Indian Energy Policy & Programs		✓		✓	✓
	Intelligence and Counterintelligence		✓		✓	✓
	International Affairs				✓	✓
	Public Affairs		✓		✓	✓
	Small and Disadvantaged Business Utilization		✓		✓	✓
Power Marketing Administrations	Technology Transitions		✓		✓	✓
	Bonneville Power Administration	✓	✓	✓	✓	✓
	Southeastern Power Administration	✓	✓	✓	✓	✓
	Southwestern Power Administration	✓	✓	✓	✓	✓
Field/Operation Offices	Western Area Power Administration	✓	✓	✓	✓	✓
	EM Consolidated Business Center	✓	✓	✓	✓	✓
	Golden Field Office	✓	✓	✓	✓	✓
	Idaho Operations Office	✓	✓	✓	✓	✓
	National Energy Technology Laboratory	✓	✓	✓	✓	✓
	NNSA Albuquerque Complex	✓	✓	✓	✓	✓
	Naval Reactors Laboratory Field Office	✓	✓	✓	✓	✓
	Oak Ridge Environmental Management	✓	✓	✓	✓	✓
	Richland Operations Office	✓	✓	✓	✓	✓
	Savannah River Operations Office	✓	✓	✓	✓	✓
	Science Consolidated Service Center	✓	✓	✓	✓	✓
Major/ Integrated Contractors	Strategic Petroleum Reserve Project Management Office	✓	✓	✓	✓	✓
	Kansas City National Security	✓	✓	✓	✓	✓
	Lawrence Livermore National Laboratory	✓	✓	✓	✓	✓
	Los Alamos National Laboratory	✓	✓	✓	✓	✓
	Nevada National Security Site	✓	✓	✓	✓	✓
	Pantex Plant/ Y-12 National Security Complex	✓	✓	✓	✓	✓
	Sandia National Laboratory	✓	✓	✓	✓	✓
	Naval Nuclear Laboratory	✓	✓	✓	✓	✓
	Ames Laboratory	✓	✓	✓	✓	✓
	Argonne National Laboratory	✓	✓	✓	✓	✓
	Brookhaven National Laboratory	✓	✓	✓	✓	✓
	Fermi National Accelerator Lab	✓	✓	✓	✓	✓
	Lawrence Berkeley National Laboratory	✓	✓	✓	✓	✓
	Princeton Plasma Physics Laboratory	✓	✓	✓	✓	✓
	Oak Ridge National Laboratory	✓	✓	✓	✓	✓
	Oak Ridge Institute for Science & Education	✓	✓	✓	✓	✓
	Pacific Northwest National Laboratory	✓	✓	✓	✓	✓
	Thomas Jefferson National Accelerator Facility	✓	✓	✓	✓	✓
	SLAC National Accelerator Laboratory	✓	✓	✓	✓	✓
	National Renewable Energy Laboratory	✓	✓	✓	✓	✓
	Strategic Petroleum Reserve	✓	✓	✓	✓	✓
	Idaho National Laboratory	✓	✓	✓	✓	✓
	Waste Isolation Pilot Plant	✓	✓	✓	✓	✓
	East Tennessee Technology Park	✓	✓	✓	✓	✓
	Savannah River Nuclear Solutions	✓	✓	✓	✓	✓
	Battelle Savannah River Alliance*	✓	✓	✓	✓	✓

* This office will be established in FY 2023.

⁹ Includes newly established organizations that are in the process of getting incorporated into the Internal Control and ERM Program.

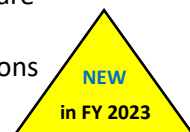
G. Important Dates and Transmittal Methods

Table 11 DOE Internal Controls Important FY 2023 Dates

Key Dates	Deliverables
December 16	AMERICA open for documenting FY 2023 internal control testing and evaluation results.
March 16	Reporting organizations (M&O Contractors, Site Offices, Field Offices, & HQ Offices) provide Interim Internal Control Status using the AMERICA Application.
April 6	OCFO publishes the FY 2023 Assurance Memoranda Template to reporting organizations.
July 13	M&O Contractors and Field Offices provide FMA Module and EA Module using the AMERICA Application. Reporting organizations should follow subsequent timelines published by cognizant organizations to assure FMA and EA Modules are provided to DOE on time.
July 27	Headquarters Offices and PMAs provide FMA Module and EA Module using the AMERICA Application.
August 10	Field Offices provide <u>draft</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV , considering and incorporating Site Offices and M&O Contractors. Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Draft".
August 28	OCFO provides eDOCS information to Headquarters Offices.
August 31	Field Offices provide <u>signed</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV . Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Signed".
	Headquarters Offices and PMAs provide <u>draft</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV . Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Draft".
September 7	Headquarter Offices, PMAs, Field Offices, M&O Contractors send their elected control test cycle approach for FY 2025 to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV .
September 14	Headquarters Offices and PMAs provide <u>signed</u> Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@HQ.DOE.GOV and eDOCS. Subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Signed".
September 21	Under Secretaries provide signed Assurance Memoranda to the Internal Controls and Fraud Risk Management Division's shared mailbox at CFO-ICFRMD@hq.doe.gov and eDOCS.
September 22	AMERICA close-out for FY 2023.
October 2	Organizations that resolve or identify a significant deficiency or material weakness, after June 30, 2023, and no later than September 30, 2023, that is not included in a signed Assurance Memoranda, must notify the OCFO and update the Assurance Memoranda.

Table 11 DOE Internal Controls Important FY 2023 Dates provides Internal Control Evaluation deadlines. Organizations must provide the Internal Control deliverables on time. If there is an emerging issue preventing an organization from providing a deliverable on time, the organization will provide the specific reason(s) for the delay to include any potential significant deficiency or material weakness to the assigned OCFO analyst for the organization. Management quality assurance reviews will take place at every level prior to providing Internal Control deliverables and Risk Profiles.

Entities (Federal and contracting organizations) should provide the Internal Control Deliverables that are listed in **Table 10 Listing of Required Internal Control Evaluations due to OCFO by Organization** in accordance with **Table 12 Reporting Documentation Transmittal Methods**. When reporting organizations are providing draft and signed assurance memoranda, **the subject line of the e-mail should read "FY 2023 <insert org's name> Assurance Memo-Draft" or FY 2023 <insert org's name> Assurance Memo-**



Signed". For example, FY 2023 CFO Assurance Memo-Draft or FY 2023 CFO Assurance Memo-Signed, whichever is appropriate.

Table 12 Reporting Documentation Transmittal Methods

Deliverable	Format	Method	Recipient(s)
EA, FMA, FMS Evaluations and IICS	AMERICA	A-123 Application	Major/ Integrated Contractors to: Field Office Field Office to: Lead Program Secretarial Office Headquarters to: OCFO
Assurance Memorandum (Including Corrective Action Plan Summary)	Signed PDF	E-mail to ICFRMD's shared mailbox at CFO-ICFRMD@hq.doe.gov	Field Offices Assurance Memorandum addressed to: Lead Program Secretarial Office with copies to the Cognizant Secretarial Office(s).
	Signed PDF	E-mail to ICFRMD's shared mailbox at CFO-ICFRMD@hq.doe.gov and upload to eDOCS	Headquarters and PMAs Assurance Memorandum addressed to: The Secretary Through: Appropriate Under Secretary Under Secretary to: The Secretary

H. Documentation Requirements

All organizations are required to maintain written policies and procedures for implementing the internal controls evaluation process described in this guidance. The level and nature of documentation may vary based on the size of the entity and the complexity of the operational processes the entity performs. Management uses professional judgment in determining the extent of the documentation that is developed. Documentation is required to demonstrate the design, implementation, and operating effectiveness of an entity's internal control system. These policies and procedures must include a quality assurance (QA) program conducted by Departmental Elements on inputs from the reporting organizations to provide quality and accuracy. Documentation supporting internal control evaluations and results will remain on file with the organization and upon request, provided to the OCFO, respective Field or Headquarters Office, senior managers, or auditors. Documentation records should remain on file for six (6) years.

Examples include:

- Internal and external assessments;
- Results of external audits, including financial statement audits and findings along with appropriate work papers;
- Internal audits to include working papers and/ or management reviews;
- Process flows and descriptions;
- Biennial pricing reviews;
- Test documentation more detailed than what is included in the FMA and EA Modules; and,
- Evidence collected during testing.

Organizations must have appropriate and verified procedures to test the effectiveness of the controls using re-performance, observation, inquiry, and inspection. These key procedures as referenced by A-123, Appendix A, *Implementation Guide*, should be cited in the FMA and EA Modules where applicable:

- **Re-performance** is an objective execution of procedures or controls performed as part of a test of the effectiveness of the entity's internal control (e.g., recalculating an estimate or re-performing a reconciliation).
- **Observation** is the viewing of a specific business process in action, and in particular the control activities associated with the process, to test the effectiveness of an internal control (e.g., observing a physical inventory or watching a reconciliation occur).

- **Inquiry** is a detailed discussion with knowledgeable personnel to determine if controls are in place and functioning (e.g., do you reconcile your activity or do you review a certain report each month).
- **Inspection/ Examination** is scrutiny of specific business processes and documents through consideration and analysis for approval authorities that indicate the effectiveness of controls (e.g., looking for signatures of a reviewing official or reviewing past reconciliations).

Controls testing must be sufficient and well documented. Examples of **insufficient test** result descriptions or narratives that **should be avoided** include:

- **Walkthroughs;**
- **Limited Discussions;**
- **Reviews of organization charts;** and,
- **Talking to a limited number of people, performing inadequate testing.**

These test procedures result descriptions are not adequate and detailed enough to reveal the effectiveness or weakness of internal controls. Testing procedures and results should be adequately written and have enough detail that will provide an understanding of the test and results.

When determining test procedures, complexity and frequency of controls including whether the controls are automated, or manual are key considerations. For example, complex controls that are manual and used on a regular basis should be tested more in-depth than less complex controls that are automated and used on a periodic basis. Sampling is used to select the appropriate number of transactions to test for each control. Sampling methods for consideration are:

- **Random** – A method of selecting a sample whereby each item in the population¹⁰ of transactions is given an equal chance of selection regardless of the population size. Typically, sampling software or a random number generator is used to identify the items comprising the sample. Random selection is generally considered the most likely method to result in a sample that is representative of the population.
- **Judgmental** – A method of sample selection whereby the sampled items are selected based on a deliberate choice based on the profile of the population of transactions (i.e., there may be unusual patterns or higher-risk items that exist). This method provides validation that high-risk or other items of interest are included in the selected sample and reviewed as part of testing the control.
- **Systematic** – A method of sample selection whereby a uniform interval (i.e., every *n*th item) is selected throughout the population. The appropriate interval is determined by dividing the number of items in the population by the sample size.

¹⁰ A population includes every transaction that occurred within a given time period.

Sample sizes for consideration are listed in [Table 13 Suggested Sample Sizes](#).

Table 13 Suggested Sample Sizes

Minimum Sample Size for Testing Manual Controls		
Assumed Population of Control Occurrences	Approximate Frequency of Control	Sample Size
1 – 3	Annual / Semi-Annual / Bi-Annual	1
4 – 11	Quarterly	2
12 – 23	Monthly	2 – 4
24 – 52	Weekly / Bi-Weekly	3 – 8
53 – 250	Daily	22
Over 250	Multiple Times Per Day	22
Note: In certain instances, sample sizes may need to be adjusted. There are times when the sample sizes should be increased and determined based on the population of occurrences instead of relying on the control frequency to provide reasonable assurance over the operating effectiveness of the control.		
Minimum Sample Size for Testing Automated Controls		
Description		Sample Size
For an automated control, the number of items required to be tested is minimal.		1

I. Financial Management Assessment (FMA) Evaluation

V-I.1 FMA Supporting Documentation

The FMA Module is the central location for documenting the evaluation of the relevant financial business processes, sub-processes, and risks facing each reporting entity, as well as the key controls and testing information for each process that are relied upon to mitigate the risks. Reporting entities should reference within the **Documentation Location** section of the **Assessment** tab in AMERICA the physical or electronic location of the documents that support the identification of the controls and verification of the applicability of the business process, sub-process, corporate and local risks to the entity.

This year reporting organizations which complete the FMA Module will upload supporting documentation for corporate risk **CR1504** and **CR1513**, which is associated with the **Financial Assistance Application Review and Selection** and **Financial Assistance Monitoring and Closeout** sub-processes, respectively. **Reporting organizations will provide documentation that demonstrates sufficient testing was performed on CR1504 and CR1513 if the controls mitigating CR1504 and CR1513 were previously tested, then reporting organizations will upload documentation from the last time the control (s) mitigating CR1504, and CR 1513 were tested.**



V-I.2 Requirements for FY 2023

In FY 2023, entities must perform, at a minimum, these actions:

- Re-assess risks and adjust Risk Exposure Ratings in the FMA Module* - Each entity should consider whether risk factors, such as organizational restructurings, system changes or upgrades, process changes, audit findings, external events, or other changes that occurred over the past year affect the risk assessment ratings. If so, entities can adjust their risk exposure rating or mark the appropriate area in the **Assessment** tab in the **Other Factors to Consider** section, and the *In Scope Now* column may change to **yes** due to the updated risk assessment. If the controls in the *In Scope Now* column change to **yes** due to a change in the risk assessment, entities should include the testing for those controls related to the respective risks into the testing schedule. It is important to note that the annual risk re-evaluation could result in a

determination that certain risk exposure ratings may be reduced because of program changes, including a decreased number of transactions or lower dollar amounts.

- b. *Consider applicability of corporate risk statements that uses Federal language and/ or identifies DOE specific systems – Major/ Integrated Contractors should reconsider corporate risk statements that have previously been marked as not relevant due to the language or naming of a system.* When reassessing the corporate risk statements, reporting organizations should determine whether the corporate risk has been previously identified as not relevant due to the language that is used or the naming of a system. For example, a corporate risk statement may identify a risk using a term such as “Contracting Officer Representative”. A Major/ Integrated Contractor may use the term “Technical Project Officer”. Another example may be the naming of a system such as the “Strategic Integrated Procurement Enterprise System (STRIPES)”, which is the Department’s procurement system for contract requisitions. A Major/ Integrated Contractor’s procurement system has a different name. Regardless of the term or name that is used, the intent of the risk remains the same. In each situation, Major/ Integrated Contractors should:
 - i. Identify the corporate risks to remain not relevant and prepare local risks using the language that is specific to the reporting organization, then perform risk assessments on the local risks; or,
 - ii. Identify the corporate risks as relevant and perform risk assessments on the corporate risks with an understanding the language may be different. However, the intent of the risk is the same.
- c. *Consider if multiple controls are needed for risks rated as high -* For entities that have risks which are rated high **and only** have one control to mitigate the risk from occurring, the entity should carefully re-evaluate the risk to determine if the one control is sufficient to mitigate the risk(s) from occurring or if more controls should be developed to mitigate high rated risk(s) from occurring.
- d. *Evaluate risks and test controls in cycle for the processes/sub-processes identified in [Table 14](#) –* These processes/sub-processes are the **minimum required business sub-processes** that will continue to be included in each reporting organization’s FMA Module in the **Assessment** tab. If the corporate risks for these required business sub-processes do not apply, reporting organizations must provide a brief, but sufficient rationale that explains the reason for the *Not Relevant* risk rating in the **Assessment** tab. Rationales that state a risk is “DOE’s responsibility”, “HQ responsibility”, or it is “not the organization’s responsibility” are not acceptable rationales and will require updating in FY 2023. Before concluding a corporate risk is not relevant to an entity, the organization should consider whether the risk is applicable at the local or organizational level. If needed, create a local risk for the organization and complete the evaluation and testing of controls associated with the local risk. Organizations are responsible for the risks, and the controls to manage these risks, related to the activities within these required business sub-processes

Table 14 Sub-Processes for FMA Review and Testing

Process	Sub-process	Applicability		
		HQ	Field	IC
Funds Management	Budget Formulation	✓	✓	
	Budget Generation	✓	✓	✓ (CR1204)
	Funds Distribution	✓	✓	
	Budget Execution	✓	✓	✓
Acquisition Management	Requisitioning	✓	✓	✓
	Receipt of Goods and Services	✓	✓	✓
	Contract Solicitation, Award and Adjustment	✓	✓	✓
	Contract Closeout	✓	✓	✓
	Purchase Card Program Management	✓	✓	✓
Payables Management	Invoice Approval	✓	✓	✓
Travel Administration	Travel Authorization	✓	✓	✓
	Voucher Processing	✓	✓	✓
	Travel Closeout	✓	✓	✓
	Travel Card Program Management	✓	✓	✓
Payroll Administration	Time and Attendance Processing	✓	✓	✓
	Leave Processing	✓	✓	✓

- e. *Fraud and Improper Payments Consideration* - Effective fraud risk management determines whether taxpayer dollars and government services serve the intended purposes. Entities are responsible for reviewing the controls to determine if the controls are mitigating a fraud and/ or improper payments risk. Controls that mitigate a fraud and/ or improper payments risk should be designated as such in the **Assessment** tab by **selecting the appropriate designation from the *Fraud/ Improper Payments* dropdown option for controls**. Entities should also continue to improve data integrity by removing all Fraud/ Improper Payment selections from the *Control Category* field. Organizations that had Fraud/Improper Payment selection in the *Control Category* field during the FY 2022 year-end review will need to update their selections. Affected organizations will be notified by January. Also, if a control is designed to mitigate a fraud and/ or improper payment risk and the control fails testing, or fails related to the detection of potential fraud, the organization will notify their assigned OCFO Analyst on the control failure and the remediation plan to confirm a control is designed and operating effectively to mitigate the risk.

NEW
in FY 2023

In FY 2023, fraud risk statements from the Department's Fraud Risk Register have been added as corporate risks to the FMA Module. **Reporting organizations will determine whether the fraud risks are applicable. For the fraud risk statements that are applicable, reporting organizations will perform risk assessments in FY 2023, identify mitigating controls, and test the mitigating controls no later than FY 2024.**

NEW
in FY 2023

- f. *New Risks and Controls Added to the FMA Module and Control Set Execution* – AMERICA will provide a one year grace period for reporting organizations to test the controls that are mitigating new risks that are added to the FMA module. **However, if there is sufficient data to conduct control testing, reporting organizations must test the controls that are mitigating risks with a high exposure risk rating in the same year the risks are added to the FMA Module or if the added risk is a corporate risk that has been identified as a focus area regardless of the risk rating.** If there is no sufficient data to conduct the controls testing in the same year when a reporting organization adds a risk with a high exposure risk rating or is a focus area risk, then the reporting organization will test the controls the following year. Instances when a reporting

organization does not have sufficient data to test the controls for a newly added risk, **there will not be a Control Execution rating**. As a result, the *Control Set Execution* rating should remain blank. Some scenarios may exist in AMERICA that will allow reporting organizations to receive a two year grace period for a newly added risk and control. **However, reporting organizations are required to test newly added risks and controls within one year of the risk being added to AMERICA**. Also, the reasons for **controls that are due or overdue for testing, but are not tested, should be entered into Control User Field 1**. For more details, refer to the AMERICA FMA, EA, and IICS Module User Guides.

- g. *New Corporate Risks* - In FY 2023, fifty-eight (58) corporate risks have been added to the FMA Module within AMERICA. The 58 corporate risks are financial related fraud risks that are linked to the Department's Fraud Risk Register and are mapped to risks in the Department's Fraud Risk Profile. Reporting organizations should identify relevant risks, perform risk assessments, and identify controls to mitigate the newly added corporate risks.
- h. *Complete Current Year Test Requirements* – Using the **Assessment Tab** of the FMA Module in AMERICA, entities must test applicable controls identified as **yes** or **overdue** in the *In Scope at Rollover* column and **yes** or **overdue** in the *In Scope Now* column no later than June 30. Entities should remain cognizant that the *In Scope Now* is a dynamic column that will update when **risk assessments**, control tests, and ratings are updated. When the controls in the *In Scope Now* column change to **yes** due to an updated risk assessment, entities should factor the testing for those controls into the testing schedule.
- i. *Develop Corrective Action Plans as Applicable* - A Corrective Action Plan (CAP) is required for each risk with a risk occurrence rating of 3 or a control set execution rating of 3. Organizations also have the option of developing formal CAPs for control tests that **pass with some failures**. During these instances, the organization may opt to select a control set execution rating of **2 with CAP** (rather than a **2 without CAP** rating), which will automatically initiate the CAP process similar to a rating of **3** within the FMA Module. In AMERICA, risks with a risk occurrence rating of **3** or control sets identified as a **2 with CAP** or **3** rating will automatically initiate a CAP. The CAP is a detailed, step-by-step plan with associated milestones and contains the signatures of the authorized individual approving the plan and the individual confirming completion of the plan. OMB Circular A-123 emphasizes the need to identify the root cause when developing a CAP, prompt resolution, and internal control testing to validate the correction of the control deficiency. Entities must report the root cause, along with other necessary CAP information, in the *Internal Control CAPS Details* section in the **Assessment** tab of the FMA Module.



At a minimum, a CAP will contain these key elements:

- Issue description;
- General Description;
- Source/ Type;
- CAP Title;
- Root Cause;
- Remediation Strategy/ Criteria for Closure (e.g., training, system, organization);
- Remediation Actions Taken;
- Current status and planned completion date or actual completion date; and,
- Approving Official – The first line supervisor or higher may be considered the approving official.

Entities are responsible for maintaining the CAPs and are not required to provide CAP documentation unless requested by the OCFO.

- j. *Upload Relevant and Appropriate Supporting Documentation* – Organizations are responsible for **uploading requested documentation in AMERICA for risk statement CR1504 located within the Financial Assistance Application Review and Selection sub-process and CR1513 within the Financial Assistance Monitoring and Closeout sub-process.** Documentation may include business process narratives or flowcharts, risk analyses, test plans, and other applicable documents that support the entity’s assessment and evaluation. Organizations will upload documentation sufficient to demonstrate the scope and type of testing performed and notable findings or exceptions. **If CR1504 and CR1513 were previously tested, then reporting organizations will upload documentation from the last time the control (s) mitigating CR1504 and CR1513 were tested.** For further information, refer to [Section 11, FMA Supporting Documentation](#).



- k. *Infrastructure Investment and Jobs Act (Infrastructure Bill), Inflation Reduction Act (IRA), and CHIPS and Science Act* – In FY 2023, reporting organizations and their downstream organizations that receive funding from the Infrastructure Bill, IRA, or the CHIPS and Science Act must continue to ensure business process documentation is current and properly working controls are in place for financial assistance awards that will ensure:

- i. DOE officials that are involved in the review of financial assistance applications do not have conflicts of interest;
- ii. Financial assistance applications are reviewed, selected, and awarded according to the planned schedule;
- iii. Financial assistance awards are approved by contracting officers that are certified for financial assistance;
- iv. Financial assistance awards are issued with sufficient funding;
- v. Advance notification is provided to the House and Senate appropriations committee for financial assistance awards that are in excess of \$1 million;
- vi. Non-competitive financial assistance awards have the appropriate level of authority and the approval is documented;
- vii. Monitoring of the financial assistance award is consistent with the award terms and conditions;
- viii. Recipients submit its single audit reporting package to the Federal Audit Clearinghouse in a timely manner;
- ix. Recipients are aware of required reporting;
- x. Financial assistance awards are closed out properly and in a timely manner; and,
- xi. Performance metrics are established as part of the financial assistance or program plan, and the plans are approved prior to the transfer of funds.

- l. *Complete Focus Area Testing and Actions* – Organizations must complete testing and other required actions to address their FY 2023 selected focus area risks and document the actions taken in the **Assessment** tab of the FMA Module. Headquarter Offices will perform risk assessments and test the controls that are linked to **Acquisition Management, Contractor Oversight, Financial Assistance (including Loans), and Improper Payment processes.** Corporate risks that are associated with the aforementioned processes have been added to Headquarter Offices FMA Modules in FY 2023 as focus area risks. Field Offices and M&O Contractors will target risks and test the controls that are pertinent to their specific operations. **The environmental liabilities risks are focus area risks for direct reporting EM organizations as coordinated with EM during the first quarter, FY 2023.**



V-I.3 Focus Area Guidance

Focus area risks represents areas of emphasis for the Department and are determined by senior management concerns, GAO and OIG repeat audit findings, or areas of high risks throughout the Department. Focus Area risks require additional assessment by reporting organizations regardless of the risk rating or test cycle. For FY 2023, the Department is taking more of a collaborative approach to the Focus Area Risks by being less prescriptive and coordinating with Field Offices and their reporting organizations. By doing so will allow more efficient use of limited resources while mitigating potential fraud risk occurrences. Field Offices and M&O Contractors can focus on controls that are mitigating higher rated risks that are pertinent to their operations and shift resources to areas that may require immediate attention.



Field Offices considerations for focus area risks for their organizations and M&O Contractors should consider the following:

- Passing of legislature in FY 2022;
- Recent audit findings;
- Business processes that have the highest percentage of controls failure within the past three (3) years; and,
- Areas with potential fraud, waste, or abuse.

While Field Offices and M&O Contractors are focusing on risks and controls that are pertinent to their operations, Headquarter Offices will focus on risk assessments and controls that are mitigating risks that are linked to financial assistance awards including loans that are associated with the *Infrastructure Investment and Jobs Act (IIJA)*, *Inflation Reduction Act (IRA)*, and the *CHIPS and Science Act*. **Reporting organizations that are using local risks as their focus area risks will need to go to the *Other Factors to Consider* section for each local risk and change *Local Request* to “yes” to ensure the control (s) for the local risks is reported as *In Scope This Year in AMERICA* tested in FY 2023.** For further information, refer to [Section K](#). *Focus area risks by HQ Offices, PMAs, Field Offices, & M&Os.*



Reporting organizations are exempt from testing controls that are mitigating focus area risks if the controls have been tested within the past 15-month period, which is July 1, 2021 – September 30, 2022. For risks that have a low or moderate combined risk rating, and the entity has tested the controls within the last 15-month period, then the focus area assessment may verify that:

1. The business process has not changed, and
2. There were no audit findings and there were no deficiencies found during the controls testing.

If these requirements are met, the organization will check the focus area exemption box and enter this verbiage into the Action Taken dialogue box in the **Focus Area** tab: ***“The controls have been tested within the past 15-month period, the business process has remained the same, and zero deficiencies were noted during testing. The organization performed this assessment on MM/DD/YYYY.”*** If the organization has not tested the controls within the last 15-month period, then the controls mitigating the focus areas risk will require testing **regardless of the risk rating or test cycle.**

V-I.4 FMA IT Corporate Controls

For FY 2023, the Information Technology (IT) controls will remain corporate controls within the FMA Module. The IT corporate controls are security and privacy controls for information systems and organizations to protect organizational operations and assets, individuals, other organizations, and the Nation from a diverse set of threats and risks, including hostile attacks, human errors, natural disasters, structural failures, foreign intelligence entities, and privacy risks. IT corporate controls are intended to

keep DOE compliant with the National Institute of Standards and Technology (NIST) SP 800-53, Revision 5 cyber and privacy requirements. As part of this effort, AMERICA user access reviews will occur during the second and fourth quarters of each fiscal year.

Entities with IT systems will **select the IT sub-processes** applicable to the site, evaluate the appropriate risks, and test controls. Risks rated as **not relevant** must include an accompanying explanation. Controls mitigating the selected risks will receive testing based on the risk rating coupled with the last control test date.

J. Entity Assessment (EA) Evaluation

V-J.1 Purpose

The purpose of the Entity Assessment (EA) Evaluation is to conduct structured self-evaluations to provide reasonable assurance that internal control systems are designed and implemented as well as operating effectively. Self-structured evaluations are performed to verify that risks are mitigated and to validate that mission objectives are accomplished effectively, efficiently, and in compliance with laws and regulations.

There are three major objectives of the EA Evaluation. The first is to assess the status of an entity's internal controls. The second is to evaluate each entity's objectives (functions, missions, activities) to determine if there are issues that require attention. The third is to evaluate the design and efficacy of system controls to determine what degree an organization's system meets the eight financial management goals.

V-J.2 Internal Controls Evaluation

Section II of FMFIA requires an assessment of non-financial controls to verify the effectiveness and efficiency and compliance with laws and regulations. The Green Book has five components, 17 principles and 48 attributes to guide the EA Evaluation. As with last year, each reporting organization, as shown in **Table 15**, is required to perform an EA evaluation of the internal controls for entity functions (administrative, operational, and programmatic).

Organizations will report the results of the evaluations in the EA Module. The **Internal Control Evaluation** tab requires an evaluation of each entity's internal controls against the Green Book's five components and 17 principles. **For FY 2023, Headquarter Offices will ensure they are capturing the effectiveness, timeliness, and issues for internal and external reporting as part of their assessments of GAO's Green Book Principles 13 – 17, which are:**



Table 15 GAO's Green Book Principles 13-17

Component	Principle
Information and Communication	Management should use quality information to achieve the entity's objectives
Information and Communication	Management should internally communicate the necessary quality information to achieve the entity's objectives
Information and Communication	Management should externally communicate the necessary quality information to achieve the entity's objectives
Monitoring Activities	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results

Monitoring Activities	Management should remediate identified internal control deficiencies on a timely basis
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Some areas of consideration for assessing Principles 13 – 17 are the reporting of corrective action plans in the Department’s Audit Reporting and Tracking System (DARTS) and the A-123 Management of Enterprise Risk & Internal Controls Application (AMERICA).

Issues found in the evaluation of the 17 Principles must be identified and rated as to the seriousness on a scale of 1 (least serious) to 3 (most serious). Issues rated **2** or **3** require a CAP, and these issues automatically populate in the **Action Tracking** tab and require further information. There is also an **IC Summary Evaluation** tab which summarizes the results of the evaluation reported in the **Internal Control Evaluation** tab. As a result, there are **only two lines on the IC Summary Evaluation tab that require user input:**

- **Are all components operating together in an integrated manner?**
- **Is the overall system of internal control effective?**

V-J.3 Entity Objectives Evaluation

The second aspect of the EA Evaluation is an evaluation of each entity objective (e.g., functions, missions) to determine if there are issues that need to be addressed to help meet the objective. There are nine entity objective categories identified in the EA Module that need evaluation by reporting organizations:

- Fraud Prevention
- Establishment of Entity-Wide Objectives (Entity Missions)
- Infrastructure Status
- Systems & IT Posture
- Safety & Health (S&H) Posture
- Security Posture
- Continuity of Operations
- Contractor/ Subcontractor Oversight
- Environmental

Small Headquarters Offices in **Table 10** *Listing of Required Internal Control Evaluations due to OCFO by Organization* must complete five accompanying entity objectives:

- Funds Management
- Acquisition Management
- Payables Management
- Travel Administration
- Payroll Administration

The results of the evaluation for the nine (or 14 for the Departmental Elements indicated in **Table 10**) entity objective categories are reported in the **Entity Objectives Evaluation** tab. As with the evaluation of internal controls, issues identified in the entity objectives evaluation will be reported and given a rating of 1 (least serious) - 3 (most serious) depending on the seriousness of the issue. Issues identified with a rating of **2** or **3** require a CAP.

V-J.4 Financial Management Systems (FMS) Evaluation

The third aspect of the EA Evaluation is to evaluate the design and efficacy of system controls to determine what degree an organization's system meets the eight financial management goals. OMB Circular A-123, Appendix D, defines a financial management system as including an agency's overall financial operation, **reflecting the people, processes, and technology to capture, classify, summarize, and report data in a meaningful manner to support business decisions**. Financial management systems include hardware, applications and system software, personnel, procedures, data, and reporting functions. The financial management system may fully integrate with other management information systems (i.e., mixed systems) where transactions automatically flow into an accounting general ledger. The financial management system could also include manual processes to post transactions from other management systems into the accounting general ledger. OMB Circular A-123, **Appendix D provides a risk-based evaluation model that leverages the results of existing audits, evaluations, and reviews which auditors, agency management, and others already perform**. This evaluation model also includes:

1. Financial management goals common to all Federal agencies;
2. Compliance indicators associated with each financial management goal; and,
3. Recommended risk or performance level that entities should consider when assessing whether financial management goals have been met.

Organizations identified in **Table 16** as responsible for an FMS Evaluation must evaluate the design and efficacy of system controls to determine to what degree their system meets the eight financial management goals. As indicated in **Table 10**, most entities are required to complete an FMS Evaluation. The FMS Evaluation is a risk assessment that should be conducted toward the end of the assessment year, and it relies on the results of internal control evaluations and other assessment activities already performed. Organizations may use A-123 Internal Review evaluations, management's knowledge of operations, Federal Information Security Management Act (FISMA) review results, and external financial statement/ IG/ GAO audits, as applicable, to determine the entity's risk of non-compliance with the eight goals. No further evaluations or testing should be necessary to perform this FMS Evaluation. If the entity's internal control evaluations and other assessments do not provide an adequate basis for the FMS evaluation, then the entity should raise the risk levels of non-compliance with the eight goals.

The **FMS** tab within the EA Module provides a uniform Department-wide mechanism for documenting the FMS Evaluation. For each of the eight Financial Management System Goals listed in the **FMS** tab, entities will record:

- Level of risk of being non-compliant with that goal;
- Sources used in determining that risk level; and
- An evaluation summary that briefly describes any relevant assessments, evaluations, and testing performed during the assessment year – both internal and external – and the outcomes.

Guidance to assist with this determination is co-located with each rating. For each goal, entities are required to document the risk level rating and the sources used along with a summary of the evaluation results for each financial management goal in the FMS Tab in the EA Module. After entities have determined the risk level rating for each goal, the sum of the risk level ratings will automatically calculate to determine the overall FMS risk of non-compliance with FFMIA, which should support the FMS assurance in the Assurance Memorandum. Similar to the evaluation of internal controls, entities should report identified deficiencies or issues found in the FMS Evaluation and provide a rating of 1-3 depending on the seriousness of the issue. A rating of 1 being the least serious and 3 being the most serious. Issues identified in the **FMS** tab will create a line in the **Action Tracking** tab. Then, the user will need to input information required for each issue. Issues identified with a rating of **2** or **3** will require a

CAP. If there is an **existing CAP** for an FMS issue, reporting organizations must indicate and identify the existing CAP name and number in the EA Module.

Managers must use professional judgment in assessment of the FMS Goals. For example, a rating of 3 on one goal does not necessarily indicate non-conformance for the entire FMS Evaluation.

Additionally, organizations identified as owners of an FMS included in **Table 16 DOE Financial Management Systems**, must perform an FMS Evaluation to support core requirements of Section IV of FMFIA and FFMIA. If an entity's system (including Major/ Integrated Contractor systems) feed into a DOE financial management system, then those systems are subject to an FMS Evaluation.

Table 16 DOE Financial Management Systems

Financial Management System and Mixed Systems	System Owner(s)
Power Marketing Administration Systems	BPA, WAPA, SWPA, & SEPA
Standard Accounting and Reporting System (STARS)	CFO
Federal Energy Regulatory Commission Systems	FERC
Budget Formulation and Distribution System (BFADS-formerly FDS 2.0)	CFO
Electronic Work for Others	ORNL
Active Facilities Database	CFO
ABC Financials	NNSA-NA-532
Integrated Planning, Accountability and Budgeting System (IPABS)	EM-62
Facilities Information Management System (FIMS)	MA-50
Strategic Integrated Procurement Enterprise System (STRIPES)	CFO
Vendor Inquiry Payment Electronic Reporting System (VIPERS)	CFO
Financial Accounting Support System (FAST)	CFO
iBenefits	CFO
Budget and Reporting Codes System (BARC)	CFO

In accordance with the FFMIA and OMB Circular A-123, Appendix D, system owners and users should determine whether the financial and mixed systems conform to federal financial management systems requirements. As a result, entities are required to have financial management systems that substantially comply with the requirements of FFMIA Section 803(a), which includes Federal Financial Management System Requirements, federal accounting standards promulgated by the Federal Accounting Standards Advisory Board (FASAB), and the requirements of the United States Standard General Ledger (USSGL) at the transaction level.

V-J.5 Classifying Deficiencies

In accordance with OMB Circular A-123, DOE adopted a three-level rating system for reporting deficiencies to internal control principles and to issues identified in entity objective reviews. The severity of the deficiencies determines if the entity should report it in the organizational Assurance Memorandum. An entity control deficiency requires qualitative judgment that a significant deficiency exists that could adversely affect the organization's ability to meet internal control objectives, and an entity material weakness is a significant deficiency which the head of the organization determines is significant enough to report outside of the organization. The entity should document the information gathered and the decisions made related to the considerations.

Organizations must report control deficiencies that meet certain criteria in the Assurance Memorandum. **Table 17 Deficiency Classifications** provides a description of the issues that organizations

should report for each section of the Assurance Memorandum, a definition for each issue, and an indication of which issues requires a corrective action plan in the Assurance Memorandum.

NOTE: Organizations must distinguish control deficiencies (including significant deficiencies and material weaknesses) from funding and resource issues. Funding levels are not control deficiencies, and organizations should not report funding and budgetary limitations as a significant deficiency or material weakness in the Assurance Memorandum.

Table 17 Deficiency Classifications

Deficiency Title	Definition	Applicable to	Reported in Assurance Memorandum
Control Deficiency (Non-Significant Issue)	A control deficiency exists when the design, implementation, or operation of a control does not provide management or personnel, in the normal course of performing the assigned functions, to achieve control objectives and address related risks. A deficiency in design exists when (1) a control necessary to meet a control objective is missing or (2) an existing control is not properly designed so that even if the control operates as designed, the control objective would not be met. A deficiency in implementation exists when a properly designed control is not implemented correctly in the internal control system. A deficiency in operation exists when a properly designed control does not operate as designed, or when the person performing the control does not possess the necessary authority or competence to perform the control effectively.	FMA, EA	No
Significant Deficiency	A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness yet important enough to merit attention by those charged with governance.	FMA, EA	Yes
Material Weakness	<p>A significant deficiency that the Entity Head determines to be significant enough to report outside of the Entity as a material weakness. In the context of the Green Book, non-achievement of a relevant Principle and related Component results in a material weakness. A material weakness in internal control over operations might include, and is not limited to, conditions that:</p> <ul style="list-style-type: none"> • impacts the operating effectiveness of Entity- Level Controls; • impairs fulfillment of essential operations or mission; • deprives the public of needed services; or • significantly weakens established safeguards against fraud, waste, loss, unauthorized use, or misappropriation of funds, property, other assets, or conflicts of interest. <p>A material weakness in internal control over reporting is a significant deficiency, in which the Entity Head determines significant enough to impact internal or external decision-making and reports outside of the Entity as a material weakness. A material weakness in internal control over external financial reporting is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A material weakness in internal control over compliance is a condition where management lacks a process that reasonably assures preventing a violation of law or regulation that has a direct and material effect on financial reporting or significant effect on other reporting or achieving Entity objectives.</p> <p>A No response on either Line 46 or 47 in the EAT IC Summary Evaluation tab requires a Material Weakness to be reported:</p> <ul style="list-style-type: none"> • Are all components operating together in an integrated manner? or • Is the overall system of internal control effective? 	FMA, EA	Yes
Non-Conformance	Exists when financial systems do not substantially comply with federal financial management system requirements OR where local control	FMS (in the EA Module)	Yes

Deficiency Title	Definition	Applicable to	Reported in Assurance Memorandum
	deficiencies impact financial systems ability to comply. The EA Module defines the criteria against which conformance is evaluated and captures identified non-conformances.		
Scope Limitation	Exists when the Entity has identified potentially significant deficiencies in the scope of the internal control evaluations conducted, which would warrant disclosure to assure limitations are understood. Scope limitations may be determined by the entity or may be required by the CFO in certain circumstances.	FMA and EA	Yes

V-J.6 Annual Assurance Memorandum

Each entity is required to provide an annual Assurance Memorandum that documents the results of the annual FMA Evaluation if applicable, EA Evaluation, and FMS Evaluation, if applicable, along with other reviews conducted. The Assurance Memorandum provides a status of the overall adequacy, effectiveness, and efficiency of the organization's internal controls. The Assurance Memorandum must identify significant deficiencies or material weaknesses which might qualify that assurance, as defined in [Table 17 Deficiency Classifications](#), and a summary of the corrective action plans developed to address such issues will accompany the Assurance Memorandum. Organizations will also report instances of non-compliance with Federal FMS requirements or control deficiencies that affect an organization's ability to comply with the eight financial management goals.

Headquarters Offices with Field organizations must consider the results of the Field organization FMA and EA evaluations. Likewise, Field organizations with Major/ Integrated Contractors, must consider the results of the contractor FMA and EA evaluations. When considering the results of various cognizant organizations, the Departmental Element should consider multiple instances of similar control deficiencies and similar significant deficiencies across the entity to determine if a significant deficiency or material weakness exists at the Departmental Element's level.

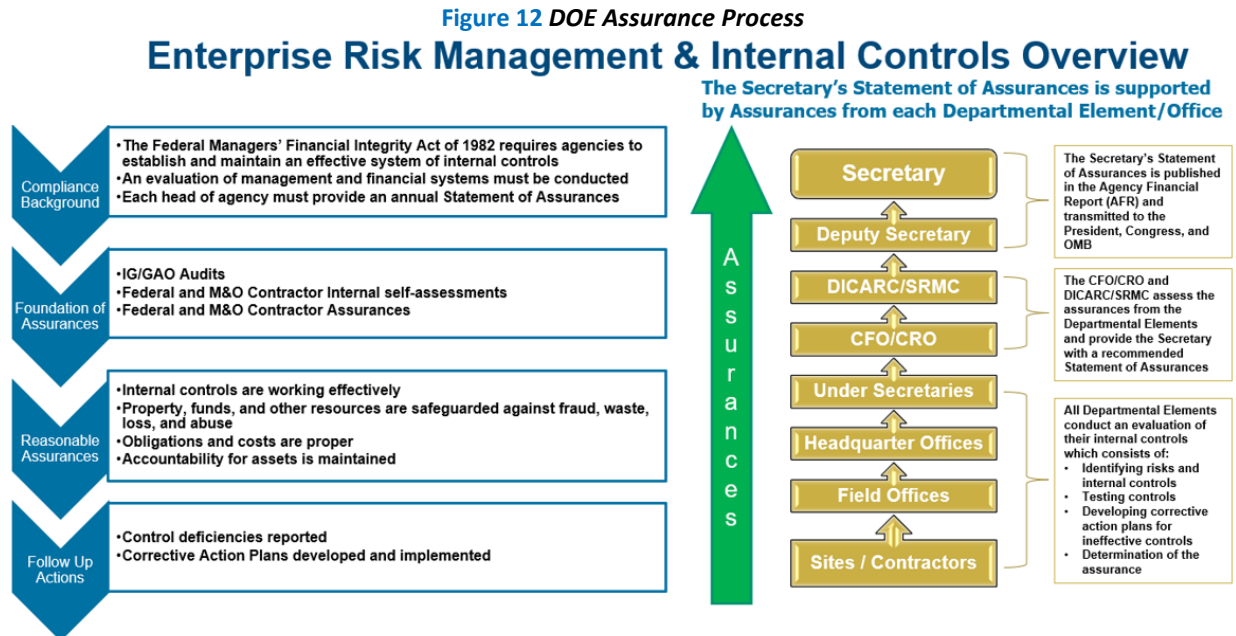
To align and comply with OMB Circular A-123, Appendix B, *A Risk Management Framework for Government Charge Card Programs*, assurances are in the Assurance Memorandum in reference to the implementation of safeguards and internal controls for inappropriate charge card practices as well as assurances that organizations have processes in place to identify risks, controls, and that the controls are operating effectively.

Organizational assurance statements include an evaluation of the effectiveness of internal control over operations, reporting and compliance as of June 30. Organizations remain responsible to provide an update to the assurance statements when a significant deficiency or material weakness is resolved or identified after June 30:

- If an organization discovers a significant deficiency or material weakness by June 30, and implements corrective actions by September 30, the organization will update the statement identifying the significant deficiency or material weakness, the corrective action taken, and the resolution occurred by September 30.
- If an organization discovers a significant deficiency or material weakness after June 30, and before September 30, the organization will update the statement identifying the significant deficiency or material weaknesses to include the subsequently identified significant deficiency or material weakness.

Organizations will notify the OCFO immediately of any resolved or new significant deficiencies or material weaknesses no later than October 1, 2023, per [Table 11](#).

Figure 12 presents the DOE annual assurance process. Assurance flows from each major/ integrated contractors to the respective Departmental element, and from the Departmental element (Field and Headquarters Offices) to the Under Secretaries. The CFO and DICARC assess the assurances from the Under Secretaries and provide the Secretary with the recommendation to sign the DOE Management Assurances.



Templates for Field Offices, PMAs, large Headquarters Offices, smaller Headquarters Offices, and Under Secretaries to use in preparation of the Assurance Memorandum will be provided in accordance with [Table 11](#). A template will be provided for PMAs in FY 2023.

The Assurance Memorandum consists of two portions:

1. Main Body – Contains the actual assurance statements and executive summaries of identified significant deficiencies or material weakness.
2. Corrective Action Plan Summary – Lists CAPs for each significant deficiency, material weakness, or non-conformance reported in the Assurance Memorandum. The CAP Summary briefly describes the remediation activities that have occurred or the remediation activities the organization will implement in the next fiscal year.

CAP Summary includes:

- (a) New Issues and CAPs; and,
- (b) Action Plans from prior-year reporting (may be open or closed). For CAPs that remediate deficiencies reported in previous years and now closed in FY 2022, the CAP Summary must include a statement noting the closure of the CAP.

Final responsibility for making assurances that financial, entity, and financial management systems internal controls are effective and efficient, produce reliable reports, and are compliant with all applicable laws and regulations lies with the head of each entity. **The head of the Departmental Element must sign the Assurance Memorandum.** During instances when the head of the Departmental Element is not available, the organization's Assurance Memorandum may be signed by the designated representative that has a Delegation of Authority Memorandum signed by the head of the Departmental

Element. Headquarters-level entities that report to an Under Secretary will provide the Assurance Memorandum to the respective Under Secretary for signature.

DOE Order 520.1B was approved January 2021 directing the head of each Departmental Element to designate an Internal Control Action Officer that will coordinate the organization's Internal Control Program that is consistent with the DOE Internal Control Evaluations Guidance. **When an organization changes the designated Internal Control Action Officer, the updated name and contact information should be provided to the ICFRMD shared mailbox at CFO-ICFRMD@hq.doe.gov.**

K. Focus area risks by HQ Offices, PMAs, Field Offices, & M&Os

Table 18 Other Headquarters/Program Offices Focus Area Risks

Business Process/Sub Process	Risk #
1.50 Financial Assistance	
1.50.20 Financial Assistance Application Review and Selection	CR1504 CR1505 CR1511
1.50.30 Financial Assistance Award	CR1501 CR1507 CR1510 CR1512
1.50.40 Financial Assistance Monitoring and Closeout	CR1508 CR1509 CR1513 CR1514 CR1515
2.10 Acquisition Management	
2.10.20 Contract Solicitation, Award, and Modification	CR2115
2.10.30 Receipt of Goods and Services	CR2116
2.10.40 Contract Closeout	CR2118 CR2121
6.40 Contractor Oversight	
6.40.40 Performance	CR6404 CR6405
6.60.10 Payment Disbursing	CR6602

Table 19 Office of the Assistant Secretary for Environmental Management (EM) Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
Office of the Assistant Secretary for Environmental Management (EM)	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection	CR1504 CR1505 CR1511
		1.50.30 Financial Assistance Award	CR1501 CR1507 CR1510 CR1512
		1.50.40 Financial Assistance Monitoring and Closeout	CR1508 CR1509 CR1513 CR1514 CR1515
	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification	CR2115
		2.10.30 Receipt of Goods and Services	CR2116
		2.10.40 Contract Closeout	CR2118 CR2121
	6.40 Contractor Oversight	6.40.40 Performance	CR6404 CR6405
		6.60.10 Payment Disbursing	CR6602

Entity Name	Business Process	Sub Process	Risk #		
Environmental Management Consolidated Business Center (EMCBC)	1.10 General Ledger Management	1.10.40 General Ledger Adjustments	CR1113		
	1.20 Funds Management	1.20.10 Budget Formulation	CR1201 CR1202 CR1203 CR1204 CR1205 CR1207 CR1208 CR1209 CR1210 CR1212 CR1213 CR1214 CR1215		
		1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection	CR1505 CR1511	
			1.50.30 Financial Assistance Award	CR1501 CR1507 CR1510 CR1512	
			1.50.40 Financial Assistance Monitoring and Closeout	CR1509 CR1515	
		2.10 Acquisition Management	2.10.10 Requisitioning	CR2102 CR2103 CR2105 CR2106 CR2107 CR2108 CR2109 CR2111 CR2127 CR2128 CR2129 CR2130 CR2118 CR2121 CR2122	
			2.30 Payables Management	2.30.10 Payee Data Maintenance	CR2302
				2.30.20 Accounts Payable Setup	CR2304
				2.30.30 Invoice Approval	CR2306 CR2307 CR2308 CR2309 CR2312 CR2313
			2.40 Travel Administration	2.40.10 Travel Authorization	CR2401 CR2402 CR2403 CR2404 CR2405 CR2406 CR2407 CR2408 CR2409
				2.40.20 Voucher Processing	
				2.40.30 Travel Closeout	
			2.40 Travel Administration	2.40.40 Travel Card Program Management	CR2410 CR2411 CR2412
			4.10 Project Cost Management	4.10.10 Project Planning	CR4102 CR4103
	4.10.30 Project Monitoring			CR4110	
	4.10.40 Project Closeout			CR4111	
	4.20 Property Management		4.20.10 Property Recognition and Recording	CR4202	
	5.10 Payroll Administration		5.10.10 Employee Profile Data Maintenance	CR5101 CR5102	
		5.10.20 Time and Attendance Processing	CR5105 CR5106		

Entity Name	Business Process	Sub Process	Risk #
EMCBC continued....	5.10 Payroll Administration	5.10.30 Leave Processing	CR5107
		5.10.40 Pay Processing	CR5108
	6.50 Information Technology	6.50.10 Network and Information Systems Security – Access Control	CR6501
			CR6504
			CR6511
			CR6514
			CR6516
			CR6518
			CR6522
			CR6526
		6.50.20 Network and Information Systems Security – Web Application Integrity	CR6502
			CR6503
			CR6506
			CR6508
		6.50.30 Network and Information Systems Security – Configuration Management	CR6509
			CR6513
			CR6517
			CR6519
		6.50.40 Network and Information Systems Security – Audit and Accountability	CR6528
			CR6510
			CR6515
			CR6527
		6.50.50 Network and Information Systems Security – Incident Response and Reporting	CR6529
			CR6520
			CR6524
			CR6525
Richland Operations Office (RL-ORP)	1.50 Financial Assistance	1.50.30 Financial Assistance Award	CR1516
	6.10 Environmental Liabilities	6.10.10 Liability Validation	CR6101
		6.10.20 EM Liability	CR6102
			CR6103
		6.10.30 Non-EM Liabilities	CR6104
			CR6105
	6.10 Environmental Liabilities	6.10.30 Non-EM Liabilities	CR6106
			CR6107
		6.10.40 Policy execution	CR6108
			CR6109
Oak Ridge Environmental Management (OREM)	6.10 Environmental Liabilities	6.10.10 Liability Validation	CR6110
			CR6111
			CR6112
			CR6113
		6.10.20 EM Liability	CR6114
			CR6115
			CR6116
			CR6117
		6.10.30 Non-EM Liabilities	CR6118
			CR6119
East Tennessee Technology Park (ETTP)	1.10 General Ledger Management	1.10.30 General Ledger Transaction Processing	CR1106
		1.10.70 Financial Statement Generation	CR1107
			CR1121
	1.20 Funds Management	1.20.30 Funds Distribution	CR1206
	1.40 Cost Management	1.40.10 Cost Accumulation	CR1401
			CR1402

Entity Name	Business Process	Sub Process	Risk #
ETTP continued...	1.40 Cost Management	1.40.20 Cost Distribution 1.40.40 Cost Accrual 1.40.50 Cost Reporting	CR1403 CR1404 CR1409 CR1410 CR1412
	2.20 Inventory Management	2.20.10 Inventory Recognition and Recording	CR2203
	2.30 Payables Management	2.30.10 Payee Data Maintenance 2.30.20 Accounts Payable Setup 2.30.30 Invoice Approval 2.30.40 Payment Disbursing	ETTP-R0001 CR2305 CR2306 CR2308 CR2311
	3.20 Receivables Management	3.20.10 Customer Information Maintenance 3.20.20 Receivables Setup and Billing 3.20.30 Receivables Monitoring 3.20.40 Receivables Closeout	CR3201 CR3205 CR3208 CR3210 CR3211
	4.10 Project Cost Management	4.10.10 Project Planning	CR4101
	4.20 Property Management	4.20.10 Property Recognition and Recording 4.20.20 Property Monitoring 4.20.30 Property Disposition	CR4201 CR4202 CR4205 CR4207 CR4208 CR4209
	5.10 Payroll Administration	5.10.10 Employee Profile Data Maintenance 5.10.30 Leave Processing 5.10.40 Pay Processing	CR5101 CR5102 CR5107 CR5108
	5.20 Benefits Administration	5.20.10 Benefits Administration - Current Employees and Former Employees	CR5201 CR5202 CR5203 CR5205
	6.50 Information Technology	6.50.10 Network and Information Systems Security – Access Control 6.50.20 Network and Information Systems Security – Web Application Integrity 6.50.30 Network and Information Systems Security – Configuration Management 6.50.40 Network and Information Systems Security – Audit and Accountability 6.50.50 Network and Information Systems Security – Incident Response and Reporting	CR6501 CR6504 CR6511 CR6516 CR6526 CR6502 CR6506 CR6508 CR6513 CR6527 CR6520 CR6524
Savannah River Operations Office (SR)	1.40 Cost Management	1.40.30 Cost Monitoring	CR1405 CR1406 CR1407
	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection	CR1504
	2.10 Acquisition Management	2.10.10 Requisitioning 2.10.20 Contract Solicitation, Award, and Modification 2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout	CR2102 CR2103 CR2115 CR2116 CR2118 CR2121
	4.10 Project Cost Management	4.10.30 Project Monitoring	CR4106
	6.10 Environmental Liabilities	6.10.10 Liability Validation 6.10.20 EM Liability 6.10.30 Non-EM Liabilities 6.10.40 Policy execution	CR6101 CR6102 CR6103 CR6105 CR6106 CR6112
	6.40 Contractor Oversight	6.40.10 Policies and Procedures 6.40.20 Payment - Cleared Funding Account 6.40.30 Incentive Fees	CR6410 CR6402 CR6403

Entity Name	Business Process	Sub Process	Risk #
SR continued...	6.50 Information Technology	6.50.10 Network and Information Systems Security – Access Control	CR6518
		6.50.20 Network and Information Systems Security – Web Application Integrity	CR6503
		6.50.30 Network and Information Systems Security – Configuration Management	CR6519
		6.50.40 Network and Information Systems Security – Audit and Accountability	CR6510
		6.60 Improper Payments	CR6601
Savannah River Labs (SRS)	2.30 Payables Management	2.30.20 Accounts Payable Setup	CR2304
	5.10 Payroll Administration	5.10.10 Employee Profile Data Maintenance	CR5101
	5.20 Benefits Administration	5.20.10 Benefits Administration - Current Employees and Former Employees	CR5205

Table 20 Office of the Assistant Secretary for Cybersecurity, Energy Security & Emergency Response (CESER)
Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
Office of the Assistant Secretary for Cybersecurity, Energy Security & Emergency Response (CESER)	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection	CR1504
			CR1505
			CR1511
		1.50.30 Financial Assistance Award	CR1501
			CR1507
			CR1510
			CR1512
		1.50.40 Financial Assistance Monitoring and Closeout	CR1508
			CR1509
			CR1513
Strategic Petroleum Reserve Project Management Office (SPRO)	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification	CR2115
			CR2116
		2.10.30 Receipt of Goods and Services	CR2118
		2.10.40 Contract Closeout	CR2121
Strategic Petroleum Reserve Project Management Office (SPRO)	6.40 Contractor Oversight	6.40.40 Performance	CR6404
			CR6405
		6.60.10 Payment Disbursing	CR6602
Strategic Petroleum Reserve Project Management Office (SPRO)	2.40 Travel Administration	2.40.20 Voucher Processing	CR2407

Table 21 PMAs Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
Bonneville Power Administration (BPA)	1.20 Funds Management	1.20.20 Budget Generation	CR1204 CR1205
	2.10 Acquisition Management	2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout	CR2116 CR2118
	4.10 Project Cost Management	4.10.10 Project Planning 4.10.20 Project Cost Accumulation 4.10.30 Project Monitoring	CR4101 CR4105 CR4106
	6.40 Contractor Oversight	6.40.10 Policies and Procedures 6.40.50 Related Party Transactions	CR6410 CR6406
	6.50 Information Technology	6.50.40 Network and Info Sys Sec - Audit and Accountability	CR6529
Southeastern Power Administration (SEPA)	1.20 Funds Management	1.20.10 Budget Formulation 1.20.20 Budget Generation 1.20.30 Funds Distribution 1.20.60 Budget Execution	CR1201 CR1205 CR1206 CR1210
	2.10 Acquisition Management	2.10.10 Requisitioning 2.10.20 Contract Solicitation, Award, and Modification	CR2102 CR2103 CR2105 CR2106 CR2111 CR2128
	6.50 Information Technology	6.50.10 Network and Info Sys Sec – Access Control 6.50.20 Network and Info Sys Sec – Web App Integrity 6.50.30 Network and Info Sys Sec – Config Mgmt 6.50.40 Network and Info Sys Sec– Audit and Accountability 6.50.50 Network and Info Sys Sec – Incident Response and Reporting	CR6501 CR6504 CR6514 CR6516 CR6518 CR6522 CR6526 CR6503 CR6506 CR6508 CR6517 CR6519 CR6529 CR6520 CR6524
Southwestern Power Administration (SWPA)	2.40 Travel Administration	2.10.50 Purchase Card Program Management 2.40.40 Travel Card Program Management	CR2122 CR2410
Western Area Power Administration (WAPA)	1.10 General Ledger Management	1.10.30 General Ledger Transaction Processing	CR1106
	2.10 Acquisition Management	2.10.30 Receipt of Goods and Services	CR2116
	2.40 Travel Administration	2.40.10 Travel Authorization 2.40.40 Travel Card Program Management	CR2401 CR2410
	6.50 Information Technology	6.50.30 Network and Info Sys Sec – Config Mgmt	CR6508

Table 22 National Nuclear Security Administration (NNSA) Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
National Nuclear Security Administration (NNSA)	2.10 Acquisition Management	2.10.50 Purchase Card Program Management	CR2122
	5.10 Payroll Administration	5.10.20 Time and Attendance Processing	CR5103 CR5104 CR5105 CR5106
	6.60 Improper Payments	6.60.10 Payment Disbursing	CR6601

Table 23 Office of the Assistant Secretary for Energy Efficiency & Renewable Energy (EERE) Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
Office of Energy Efficiency & Renewable Energy (EERE)	1.50 Financial Assistance	1.50.20 Fin Assistance Application Review and Selection	CR1504 CR1505 CR1511 CR1501 CR1507 CR1510 CR1512
		1.50.30 Financial Assistance Award	CR1508 CR1509 CR1513 CR1514 CR1515
		1.50.40 Financial Assistance Monitoring and Closeout	
	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification	CR2115 CR2116 CR2118 CR2121
		2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout	
	6.40 Contractor Oversight	6.40.40 Performance 6.60.10 Payment Disbursing	CR6404 CR6405 CR6602
Golden Field Office (GFO)	1.20 Funds Management	1.20.30 Funds Distribution 1.20.60 Budget Execution	CR1206 CR1213
	1.40 Cost Management	1.40.10 Cost Accumulation	CR1401
		1.40.20 Cost Distribution	CR1403
		1.40.30 Cost Monitoring	CR1405 CR1407 CR1410 CR1411
	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection	CR1505 CR1510 CR1508 CR1513
		1.50.30 Financial Assistance Award 1.50.40 Financial Assistance Monitoring and Closeout	
	2.10 Acquisition Management	2.10.10 Requisitioning 2.10.20 Contract Solicitation, Award, and Modification	CR2102 CR2113 CR2128
National Renewable Energy Lab (NREL)	5.10 Payroll Administration	5.10.20 Time and Attendance Processing 5.10.50 Labor Cost Distribution	CR5104 CR5106 CR5109
	6.40 Contractor Oversight	6.40.50 Related Party Transactions	CR6406
	2.10 Acquisition Management	2.10.10 Requisitioning	CR2102 CR2103 CR2105 CR2109 CR2111 CR2112 CR2113 CR2115 CR2127 CR2128 CR2129 CR2130 CR2116 CR2118 CR2120 CR2121 CR2122 NREL-R0005
		2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout 2.10.50 Purchase Card Program Management	
	6.40 Contractor Oversight	6.40.40 Performance	CR6404 CR6405 CR6406 CR6407
		6.40.50 Related Party Transactions 6.40.60 Systems Approval 6.40.70 CAS Compliance	CR6408 & CR6409

Table 24 Office of the Assistant Secretary for Fossil Energy and Carbon Management (FECM) Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
Office of the Assistant Secretary for Fossil Energy (FECM)	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection 1.50.30 Financial Assistance Award 1.50.40 Financial Assistance Monitoring and Closeout	CR1504 CR1505 CR1511 CR1501 CR1507 CR1510 CR1512 CR1508 CR1509 CR1513 CR1514 CR1515
	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification 2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout	CR2115 CR2116 CR2118 CR2121
	6.40 Contractor Oversight	6.40.40 Performance 6.60.10 Payment Disbursing	CR6404 CR6405 CR6602
National Energy Technology Lab (NETL)	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection 1.50.30 Financial Assistance Award 1.50.40 Financial Assistance Monitoring and Closeout	CR1511 CR1501 CR1509 CR1513

Table 25 Office of the Assistant Secretary for Nuclear Energy (NE) Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
Office of the Assistant Secretary for Nuclear Energy (NE)	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection 1.50.30 Financial Assistance Award 1.50.40 Financial Assistance Monitoring and Closeout	CR1504 CR1505 CR1511 CR1501 CR1507 CR1510 CR1512 CR1508 CR1509 CR1513 CR1514 CR1515
	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification 2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout	CR2115 CR2116 CR2118 CR2121
	6.40 Contractor Oversight	6.40.40 Performance 6.60.10 Payment Disbursing	CR6404 CR6405 CR6602
Idaho Operations Office (ID)	1.20 Funds Management	1.20.30 Funds Distribution 1.20.60 Budget Execution	CR1206 CR1213
	1.40 Cost Management	1.40.20 Cost Distribution 1.40.30 Cost Monitoring	CR1403 CR1406 CR1408
	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection 1.50.30 Financial Assistance Award 1.50.40 Financial Assistance Monitoring and Closeout	CR1505 CR1511 CR1501 CR1508 CR1513
	2.10 Acquisition Management	2.10.10 Requisitioning 2.10.20 Contract Solicitation, Award, and Modification	CR2103 CR2115
	2.30 Payables Management	2.30.10 Payee Data Maintenance 2.30.30 Invoice Approval	CR2302 CR2308
	2.40 Travel Administration	2.40.10 Travel Authorization 2.40.40 Travel Card Program Management	CR2403 CR2410
	4.10 Project Cost Management	4.10.10 Project Planning	CR4101

Entity Name	Business Process	Sub Process	Risk #
ID continued...	4.10 Project Cost Management	4.10.20 Project Cost Accumulation 4.10.30 Project Monitoring	CR4105 CR4106
	4.20 Property Management	4.20.20 Property Monitoring	CR4206
	5.10 Payroll Administration	5.10.20 Time and Attendance Processing	CR5103
	5.20 Benefits Administration	5.20.10 Benefits Administration - Current and Former Employees	CR5202
	6.10 Environmental Liabilities	6.10.10 Liability Validation	CR6101
	6.40 Contractor Oversight	6.40.40 Performance 6.40.70 CAS Compliance	CR6404 CR6409
	6.50 Information Technology	6.50.20 Network and Information Systems Security – Web Application Integrity	CR6502 CR6503
	6.60 Improper Payments	6.60.10 Payment Disbursing	CR6601
Idaho National Laboratory (INL)	1.20 Funds Management	1.20.60 Budget Execution	CR1210
	1.40 Cost Management	1.40.10 Cost Accumulation 1.40.40 Cost Accrual 1.40.50 Cost Reporting	CR1401 CR1409 CR1410 CR1411 CR1412
	2.10 Acquisition Management	2.10.40 Contract Closeout	CR2121
	2.30 Payables Management	2.30.30 Invoice Approval	CR2307
	2.40 Travel Administration	2.40.10 Travel Authorization	CR2403
	4.10 Project Cost Management	4.10.20 Project Cost Accumulation	CR4105
	6.50 Information Technology	6.50.10 Network and Information Systems Security – Access Control	CR6504 CR6518

Table 26 Office of Science (SC) Focus Area Risks

Entity Name	Business Process	Sub Process	Risk #
Office of Science (SC)	1.50 Financial Assistance	1.50.20 Financial Assistance Application Review and Selection 1.50.30 Financial Assistance Award 1.50.40 Financial Assistance Monitoring and Closeout	CR1504 CR1505 CR1511 CR1501 CR1507 CR1510 CR1512 CR1508 CR1509 CR1513 CR1514 CR1515
	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification 2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout	CR2115 CR2116 CR2118 CR2121
	6.40 Contractor Oversight	6.40.40 Performance 6.60.10 Payment Disbursing	CR6404 CR6405 CR6602
	3.20 Receivables Management	3.20.10 Customer Information Maintenance 3.20.20 Receivables Setup and Billing 3.20.30 Receivables Monitoring	CR3201 CR3202 CR3205 CR3206 CR3207 CR3209
	5.10 Payroll Administration	5.10.20 Time and Attendance Processing	CR5103 CR5104 CR5105
	6.50 Information Technology	6.50.10 Network & Info Sys Sec – Access Control 6.50.20 Network & Info Sys Sec – Web App Integrity 6.50.30 Network & Info Sys Sec - Configuration Mgmt	CR6518 CR6502 CR6508
Argonne National Lab (ANL)	1.10 General Ledger Management	1.10.30 General Ledger Transaction Processing	CR1110
	1.40 Cost Management	1.40.10 Cost Accumulation 1.40.30 Cost Monitoring 1.40.50 Cost Reporting	CR1401 CR1406 CR1412
	2.10 Acquisition Management	2.10.40 Contract Closeout 2.10.50 Purchase Card Program Management	CR2118 CR2122
	4.20 Property Management	4.20.10 Property Recognition and Recording	CR4202

Entity Name	Business Process	Sub Process	Risk #
ANL continued...	4.20 Property Management	4.20.20 Property Monitoring	CR4207
	5.10 Payroll Administration	5.10.20 Time and Attendance Processing	CR5103 CR5105
	6.50 Information Technology	6.50.30 Network & Info Sys Sec – Configuration Mgmt	CR6506
Brookhaven National Lab (BNL)	2.10 Acquisition Management	2.10.10 Requisitioning	CR2102 CR2103 CR2105 CR2112 CR2116 CR2118 CR2122
		2.10.20 Contract Solicitation, Award, and Modification	
		2.10.30 Receipt of Goods and Services	
		2.10.40 Contract Closeout	
		2.10.50 Purchase Card Program Management	
	2.20 Inventory Management	2.20.10 Inventory Recognition and Recording	CR2202
Fermi National Accelerator Lab (FNAL)	5.10 Payroll Administration	5.10.20 Time and Attendance Processing	CR5103 CR5105 CR5106
	6.50 Information Technology	6.50.10 Network & Info Sys Sec – Access Control	CR6526
		6.50.20 Network & Info Sys Sec – Web App Integrity	CR6503
Lawrence Berkeley National Lab (LBNL)	1.40 Cost Management	1.40.30 Cost Monitoring	CR1406
	2.40 Travel Administration	2.40.10 Travel Authorization	CR2401
	1.20 Funds Management	1.20.60 Budget Execution	CR1210
	4.20 Property Management	4.20.20 Property Monitoring	CR4207
	5.10 Payroll Administration	5.10.10 Employee Profile Data Maintenance	CR5101
	6.10 Environmental Liabilities	6.10.10 Liability Validation	CR6101 CR6102 CR6103 CR6104 CR6105 CR6106 CR6107
		6.10.20 EM Liability	
		6.10.30 Non-EM Liabilities	
	6.10 Environmental Liabilities	6.10.30 Non-EM Liabilities	CR6108 CR6109 CR6110 CR6111 CR6112 CR6113 CR6114 CR6115 CR6116 CR6117
		6.10.40 Policy execution	
		6.10.50 Active Facilities	
Oak Ridge Institute for Science & Education (ORISE)	2.30 Payables Management	2.30.10 Payee Data Maintenance	CR2301
		2.30.20 Accounts Payable Setup	CR2303
		2.30.40 Payment Disbursing	CR2309
Oak Ridge National Laboratory (ORNL)	6.60 Improper Payments	6.60.10 Payment Disbursing	CR6601
	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification	CR2112
	2.30 Payables Management	2.30.40 Payment Disbursing	CR2309 CR2312
	5.10 Payroll Administration	5.10.40 Pay Processing	CR5108
Pacific Northwest National Lab (PNNL)	6.40 Contractor Oversight	6.40.40 Performance	CR6405
	1.30 Funds Balance with Treasury	TBD	TBD
	3.20 Receivables Management	TBD	TBD
	5.10 Payroll Administration	5.10.20 Time and Attendance Processing	CR5103 CR5104 CR5105
Princeton Plasma Physics Lab (PPPL)	1.20 Funds Management	1.20.60 Budget Execution	CR1210
	1.40 Cost Management	1.40.10 Cost Accumulation	CR1401 CR1402 CR1406 CR1408
		1.40.30 Cost Monitoring	
		1.40.50 Cost Reporting	CR1412
	2.10 Acquisition Management	2.10.10 Requisitioning	CR2102 CR2103 CR2105 CR2106 CR2107 CR2112
		2.10.20 Contract Solicitation, Award, and Modification	

Entity Name	Business Process	Sub Process	Risk #
PPPL continued...	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification	CR2115 CR2130 CR2116 CR2118 CR2120 CR2121 CR2122
		2.10.30 Receipt of Goods and Services 2.10.40 Contract Closeout	
		2.10.50 Purchase Card Program Management	
	4.10 Project Cost Management	4.10.10 Project Planning	CR4101 CR4102 CR4103 CR4104 CR4106 CR4107 CR4108 CR4109
		4.10.20 Project Cost Accumulation 4.10.30 Project Monitoring	
	4.20 Property Management	4.20.20 Property Monitoring 4.20.30 Property Disposition	CR4207 CR4209
	5.10 Payroll Administration	5.10.20 Time and Attendance Processing	CR5103 CR5104 CR5106 CR5107 CR5108 CR5109
		5.10.30 Leave Processing 5.10.40 Pay Processing 5.10.50 Labor Cost Distribution	
	1.40 Cost Management	1.40.30 Cost Monitoring	CR1406
Science Consolidated Service Center (SC-CSC)	1.50 Financial Assistance	1.50.40 Financial Assistance Monitoring and Closeout	CR1508
	2.10 Acquisition Management	2.10.50 Purchase Card Program Management	CR2122
SLAC National Accelerator Lab (SLAC)	1.10 General Ledger Management	1.10.50 General Ledger Reconciliation 1.10.70 Financial Statement Generation	CR1117 CR1121
	1.40 Cost Management	1.40.10 Cost Accumulation 1.40.20 Cost Distribution 1.40.30 Cost Monitoring	CR1401 CR1403 CR1405 CR1406 CR1407
	2.10 Acquisition Management	2.10.20 Contract Solicitation, Award, and Modification 2.10.40 Contract Closeout	CR2106 CR2112 CR2118 CR2120 CR2121 CR2122
		2.10.50 Purchase Card Program Management	
	2.30 Payables Management	2.30.10 Payee Data Maintenance	CR2301
	2.30 Payables Management	2.30.10 Payee Data Maintenance 2.30.20 Accounts Payable Setup 2.30.30 Invoice Approval	CR2302 CR2304 CR2306 CR2307 CR2309
		2.30.40 Payment Disbursing	
	2.40 Travel Administration	2.40.40 Travel Card Program Management	CR2410 CR2411 CR2412
	4.10 Project Cost Management	4.10.20 Project Cost Accumulation 4.10.30 Project Monitoring 4.10.40 Project Closeout	CR4104 CR4105 CR4107 CR4111
	5.10 Payroll Administration	5.10.10 Employee Profile Data Maintenance 5.10.20 Time and Attendance Processing	CR5101 CR5103 CR5104 CR5105 CR5108
		5.10.40 Pay Processing	
	6.10 Environmental Liabilities	6.10.50 Active Facilities	CR6113
	6.40 Contractor Oversight	6.40.40 Performance 6.40.70 CAS Compliance	CR6404 CR6405 CR6408 CR6409
Thomas Jefferson National Accelerator Facility (TJNAF)	1.10 General Ledger Management	TBD	TBD
	1.30 Funds Mgmt with Treasury	TBD	TBD
	5.10 Payroll Administration	5.10.50 Labor Cost Distribution	CR5109

VI. Appendix D, Data Analytics Guidance

[Data Analytics Guidance in progress....]

VII. Appendix E, Management Priorities Guidance

A. Background

Appendix E provides guidance on the preparation and updates of the Department of Energy's (DOE) Management Priorities included in DOE's annual Agency Financial Report (AFR). This appendix is **applicable to Management Priority Owners and Management Priority lead coordinating offices only.**

Management Priorities represent the most important strategic management issues facing the Department and are reviewed and identified by DOE's Senior Risk Management Council (SRMC), the Departmental Internal Control and Assessment Review Council (DICARC). The DICARC considers the results and any significant deficiencies and/ or material weaknesses reported in the Departmental Elements' Assurance Memoranda. The DICARC also consults and considers the DOE Inspector General's (IG) Management Challenges and the Government Accountability Office's (GAO) biennial High Risk Series update when assembling DOE's Management Priorities.

B. Management Priorities

Each DOE Management Priority is assigned a Senior Executive owner and lead responsible office to track the action progress and prepare annual enterprise updates for inclusion in the AFR. In FY 2022, the owner or lead responsible office for each Management Priority will provide updates to the Office of the Chief Financial Officer (OCFO) during the third and fourth quarters of the fiscal year. The lead responsible office of the Management Priority will update the narrative with an enterprise perspective and approve each priority update prior to delivering to the OCFO. See [Table 27](#) for the list of Management Priorities reported along with the assigned lead coordinating offices.

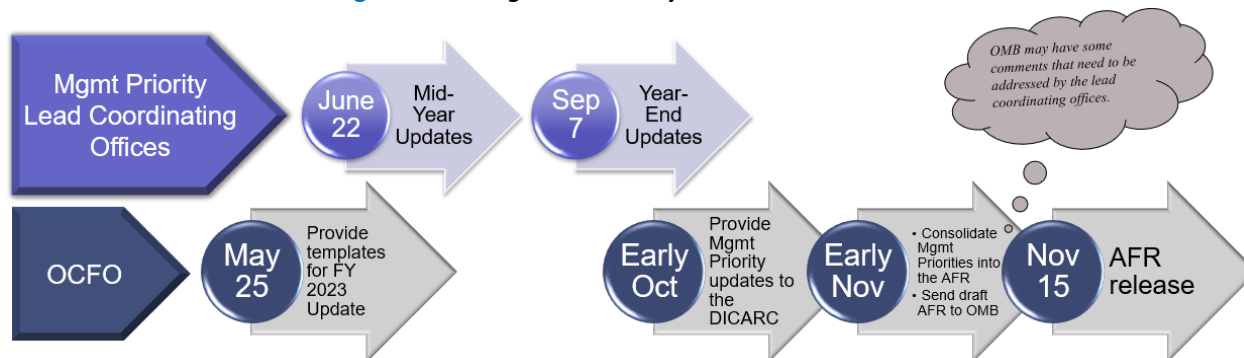
Table 27 DOE's Management Priorities and Lead Coordinating Offices

Management Priorities in FY 2022	Lead Coordinating Offices
Cybersecurity	CIO
Human Capital Management & Diversity and Inclusion	HC & ED
Contractor & Major Project Management	MA
Infrastructure	MA
Nuclear Waste Disposal	NE
Safety & Security	EHSS (including Program Office input)
Nuclear Stockpile Stewardship	NNSA
Environmental Cleanup	EM
Climate Change	MA
Energy Justice	ED

C. Management Priorities Update Process

In the third quarter of FY 2023, the OCFO will provide the lead coordinating offices with Management Priorities published in the previous fiscal year AFR. The owners and lead coordinating offices will update the narrative (using tracked changes) based on significant activities and results performed in FY 2023. In the fourth quarter, OCFO will provide each lead coordinating office with relevant significant deficiencies and/or material weaknesses reported by Departmental Elements along with the top risks throughout DOE for potential consideration and incorporation into Management Priorities updates. Lead coordinating offices will consider the enterprise reported results and provide a fourth quarter Management Priorities update (using tracked changes) to the OCFO. **Figure 13** shows an illustration of the process with timelines for both the OCFO and the Management Priority lead coordinating offices.

Figure 13 Management Priority Process with Timeline



The OCFO will provide the Management Priorities updates to the DICARC for consideration along with the OIG Management Challenges and the GAO High Risk List. The DICARC will meet in May 2023 and determine whether to revise, edit, or maintain DOE's Management Priorities. The Management Priorities updates determined by the DICARC will be reported in the FY 2023 DOE AFR and will serve as the starting point for the FY 2024 update process.

D. Guideline on Writing the Management Priority Narrative

The Management Priority narrative is composed of the *Title Header*, *Key Challenges*, and *Departmental Initiatives*. Refer to **Table 28** for the description of each section.

Table 28 Management Priorities Narrative Structure

Structure	Instructions
Management Priority Title Header	Management Priority Title Headers are consistent with the Management Priorities approved by the Departmental Internal Control and Assessment Review Council (DICARC). Any newly identified management priorities need to be coordinated with the corresponding DICARC representatives.
Key Challenges	<p>Introduction: Provide a narrative description of the management priority in terms of the key challenges DOE faces (what risks or vulnerabilities do the challenges present to DOE?). Summarize the specific elements and contributors of the challenges associated with the management priority.</p> <p>Body: Use bullets and sub-bullets to provide additional detail for each area under the key challenges.</p>
Departmental Initiatives	<p>Introduction: Provide a summarized description of the Department's efforts taken and on-going initiatives to improve and/or address the key challenges identified with the management priority.</p> <p>Body: Use bullets and sub-bullets to provide additional detail on specific elements or factors associated with challenges or initiatives.</p>

The next succeeding tables provide consideration for word usage and formatting.

Table 29 Management Priority Narrative Word Usage

Item #	Topic	Word Usage Considerations		
1	Active Voice	Use ACTIVE voice. Correct: “DOE implemented controls to restrict access to the accounting system by unauthorized personnel.” Incorrect: “DOE has implemented controls that will restrict access to the accounting system by unauthorized personnel.”		
2	Bulleted Lists	Do not begin a bullet with “the”. Begin with an action verb when possible. (Particularly for describing the initiatives taken). Strive for a consistent tone in the opening sentence of each bullet under a particular key challenge/initiative: <ul style="list-style-type: none">▪ “Improved X by...”▪ “Completed X to...”▪ “Developed X to...” OR <ul style="list-style-type: none">▪ “Improving X by...”▪ “Completing X to...”▪ “Developing X to...”		
3	Buzz Words	Avoid buzz words, such as: <ul style="list-style-type: none">▪ Allow▪ Cultivate▪ Driver▪ Engage▪ Ensure▪ Stakeholders▪ Utilize		
4	Other Words	Other words to avoid include: <table><tr><td><ul style="list-style-type: none">▪ Additional, additionally, in addition▪ Amplify▪ Any▪ As follows, following (when referencing a location within document)▪ Customer▪ Enable▪ Etc.▪ Everything▪ Few▪ Furthermore▪ Great▪ However</td><td><ul style="list-style-type: none">▪ Invaluable▪ Many▪ Rigorous▪ Required (Use “needed,” where applicable)▪ Robust▪ Should (when unnecessary, delete)▪ Show, showed▪ Some▪ Soon▪ That (when unnecessary, delete)▪ Therefore▪ Their▪ Whether</td></tr></table>	<ul style="list-style-type: none">▪ Additional, additionally, in addition▪ Amplify▪ Any▪ As follows, following (when referencing a location within document)▪ Customer▪ Enable▪ Etc.▪ Everything▪ Few▪ Furthermore▪ Great▪ However	<ul style="list-style-type: none">▪ Invaluable▪ Many▪ Rigorous▪ Required (Use “needed,” where applicable)▪ Robust▪ Should (when unnecessary, delete)▪ Show, showed▪ Some▪ Soon▪ That (when unnecessary, delete)▪ Therefore▪ Their▪ Whether
<ul style="list-style-type: none">▪ Additional, additionally, in addition▪ Amplify▪ Any▪ As follows, following (when referencing a location within document)▪ Customer▪ Enable▪ Etc.▪ Everything▪ Few▪ Furthermore▪ Great▪ However	<ul style="list-style-type: none">▪ Invaluable▪ Many▪ Rigorous▪ Required (Use “needed,” where applicable)▪ Robust▪ Should (when unnecessary, delete)▪ Show, showed▪ Some▪ Soon▪ That (when unnecessary, delete)▪ Therefore▪ Their▪ Whether			
5	Acronyms	<ul style="list-style-type: none">▪ Consider using if term is referenced multiple times throughout section (two or more times).▪ Consider writing out if only used once.		
6	Pronouns	Avoid using pronouns, such as: I, you, she/he, it, and this.		
7	Titles	Use titles instead of actual names.		

Table 30 Formatting Considerations

Item #	Topic	Formatting Considerations
1	Spacing	Double space after periods and colons.
2	Bullets	Do not begin a bullet with “the”.
3	Bullets	Spacing for bulleted lists: <ul style="list-style-type: none"> • First level indent is 0.00” (depicted by a black dot) <ul style="list-style-type: none"> ○ Second level indent is 0.25” (depicted by a hollow dot)
4	Bullets	No comma after “and”. Example: <ul style="list-style-type: none"> • Completed removal of the Livermore Pool Reactor from within Building 280 and awarded an inter-agency agreement to demolish Building 280; • Completed demolition of Building 175; and • Commenced demolition of Building 251.
5	List	Where there is a list, use number list with open and close parenthesis. Example: Currently, DOE is tracking towards completing three high-priority initiatives: (1) example; (2) example; and (3) example.
6	Publications	Italicize publications.
7	Quotations	Only use quotation marks around direct quotes.
8	Numbering	Spell out numbers less than 10 (one, two, three, ...nine, 10, 11, 12...)
9	Fiscal Year Reference	Formatting should be FY XXXX (Example: FY 2023).
10	Commonly Used Acronyms	DoD (lower caps “o” – Department of Defense EO (without periods) – Executive Order U.S. (with periods) – United States
11	Non-Breaking Space	Use non-breaking space for any form of measurement, date references, and fiscal year reference. (Example: \$65 million, 90 tons, FY 2023, December 2023).
12	Font	Font Style: Cambria Font Size: 10
13	Percent	Percent should be spelled out.
14	Hyperlink	Confirm hyperlinks are working before inserting into the document. Ensure that the links contain accurate information.
15	Sentence Tense	The AFR is released every year on the 15 th of November. Earmark certain passages or paragraphs where the tense needs to be corrected at year-end.

E. Management Priorities Due Dates

Table 31 provides a summary of the Management Priorities key dates and deliverables for FY 2023. Management Priority owners and lead coordinating offices should contact the Internal Controls Fraud Risk & Management Division (email: CFO-ICFRMD@hq.doe.gov) if there are any issues in meeting the below deadlines.

Table 31 Management Priorities Key Dates

FY 2023 Key Dates	Deliverables
May 25	OCFO provides the lead coordinating offices with Management Priorities in required templates for FY 2023 update. Note: Applicable to Management Priority Lead Coordinating Offices Only.
June 22	Lead coordinating offices provide OCFO with mid-year updates on Management Priorities using provided templates based on FY 2023 planned and performed enterprise activities. Note: Applicable to Management Priority Lead Coordinating Offices Only.
September 7	Lead coordinating offices provide OCFO with Management Priorities year-end updates. Note: Applicable to Management Priority Lead Coordinating Offices Only
Early to Mid-November	Be prepared to provide responses for potential OMB comments.

VIII. Appendix F, Glossary of Terms

AMERICA	An application that automates and streamlines the Department's management, reporting, and analysis of risks and controls in compliance with OMB Circular A-123.
Assurance Memorandum	Annual statement of assurance provided by reporting organizations that expresses the overall adequacy and effectiveness of the system of internal controls. For the required Assurance Memorandum content, see Appendix D, <i>Assurance Memorandum Templates</i> .
Basis of Evaluation	<p>The key information or activities performed to provide support for assurances that the control objectives and considerations were addressed.</p> <p>The Basis of Evaluation should be a documented activity. Examples include reports, bi-annual workforce planning survey results, other reports, memos, reviews, assessments, evaluations, plans, emails, meeting minutes, certificates, and documented signatures.</p>
Bid-rigging	Agency officials or contractors bidding on a contract conspire to influence the purchase of goods or services to avoid competitive bidding controls. Bid-rigging typically involves contractors agreeing to artificially increase the prices of goods or services offered in bids to the government or bidding in such a way to guarantee a specific contractor wins the contract.
Billing Schemes	Contractors obtaining payment by submitting invoices for fictitious goods or services, inflated invoices, or invoices for personal purchases.
Budget to Close (B2C)	The cycle comprises financial and/or accounting processes used to manage financial data and resources such as: General Ledger Management; Funds Management; Fund Balance with Treasury; Cost Management; Grants Administration; and Loan Administration. Specific areas involved in the cycle are budgeting, journal entries, costing reconciliations, financial reporting and closing activities at month, quarter, and year-end.
Combined Risk Assessment	<p>The residual risk considering the control environment and a measure of the end risk to DOE. In the FMA Module, the combined risk is a calculated field based on exposure risk and control risk. If an organization has not performed control testing, the combined risk rating defaults to the exposure risk rating. Once control testing is conducted and recorded, the combined risk will automatically calculate.</p> <p>H – High risk, ineffective risk mitigation; M – Moderate risk; and L – Low risk, effective risk mitigation.</p> <p>The diagram demonstrates the calculation of High, Moderate, and Low combined risk ratings.</p>

Exposure Risk	H	Moderate	High	High
	M	Low	Moderate	High
	L	Low	Low	Moderate
		L	M	H
		Control Risk		

Conflicts of Interest

Agency officials or government contractors inappropriately awarding business to vendors in which they have an unreported direct or indirect interest, potentially resulting in higher contract costs or purchases of goods or services not needed. Conflicts of interest can arise at the individual or organizational level. Organizational conflict of interest can occur when a contractor has a preexisting relationship with a potential subcontractor or vendor that results in inappropriate award of subcontracts at higher cost to the government.

Contract Progress Schemes

Contractors inappropriately obtaining payments by purposefully misrepresenting the extent of project completion.

Control Deficiency

A control deficiency exists when the design, implementation, or operation of a control does not allow management or personnel, in the normal course of performing the assigned functions, to achieve control objectives and address related risks. There are three types of control deficiencies:

Design Deficiency – A deficiency in design exists when (1) a control necessary to meet a control objective is missing or (2) an existing control is not properly designed so that even if the control operates as designed, the control objective would not be met.

Implementation Deficiency – Exists when a properly designed control is not implemented correctly in the internal control system.

Operating Deficiency – Exists when a properly designed control does not operate as designed, or when the person performing the control does not possess the necessary authority or competence to perform the control effectively.

Control Execution

A rating resulting from individual control testing. Control Execution ratings are defined in the FMA Module as:

- 1 – Passed with no failures.
- 2 – Passed with failures within acceptable threshold.
- 3 – Failed.

Control Objective

Identifies the key objectives to be achieved by the internal control in each area, as well as specific types of control issues that should be considered when performing the evaluation and the goal to be achieved to minimize, manage, or mitigate risks. Each objective considers the nature of the activity, the organization's mission, and the cost and benefits of each control in determining desired control objectives.

Control Risk Assessment

A measure of the risk considering the effectiveness of the controls to mitigate that risk and the risk occurrence. In the FMA Module, control risk is calculated based on the **Control Set Execution** and **Risk Occurrence scores**. The diagram demonstrates the calculation of High, Moderate, and Low control risk ratings:

Risk Occurrence	3	M	H	H
	2	L	M	H
	1	L	L	M
		1	2	3
		Control Set Execution		

Control Set Execution: Rating based on an assessment of the testing results of all individual controls within a control set.

- 1 - Passed with no failures;
- 2 - Passed with failures within acceptable threshold; or
- 3 - Failed.

Risk Occurrence: Determined through observation during normal business operations. Ask, did the risk occur during normal business operations within the current testing year?

- 1 - No risk occurrence;
- 2 - Risk occurred within acceptable threshold; or
- 3 - Risk occurred outside the acceptable threshold.

Example scenarios for rating risk occurrence and control set execution are available on the Internal Controls iPortal space under the Resources tab.

Corporate Risk

A risk that is pre-populated into the FMA Module to facilitate the FMA Evaluation. The FMA Module also allows each organization to add local risks.

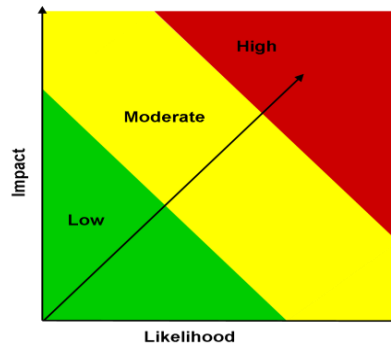
Corrective Action Plan (CAP)

A plan to correct a control deficiency. A CAP must be prepared and tracked for all significant control deficiencies identified during the internal control evaluations process. A CAP Summary for significant deficiencies and material weaknesses identified in the Assurance Memorandum must be provided with the memorandum.

Data Analytics

Process of examining data sets in order to find trends and draw conclusions about the information.

Departmental Element	Refers to DOE Headquarters Offices, Power Marketing Administrations, Field, and/or Operations Offices.
Entity	Refers to DOE reporting organizations and includes DOE Headquarters Offices, Field Offices, Site Offices, Power Marking Administrations, Operations Offices, and Major/Integrated Contractors.
Entity Assessment (EA) Module	The central location for documenting and reporting the results of evaluations of the entity's internal controls and objectives as well as financial management system evaluations.
Entity Evaluation	Detailed evaluation of an organization's key administrative, operational, or programmatic activities, to determine whether adequate control techniques exist and are implemented to achieve cost-effective compliance with FMFIA and FFMIA.
Entity Level Controls	Controls that have a pervasive effect on an entity's internal control system and pertains to multiple components.
Enterprise Risk Management (ERM)	An agency-wide approach to addressing the full spectrum of DOE external and internal risks by understanding the combined impact of all organization risks as an interrelated portfolio, rather than addressing risks in individual programs.
Evaluation Summary	Presents the key information or activities leveraged/performed to provide reliable support for assurances that the control objectives and considerations have been addressed.
Exposure Risk Assessment	<p>A combined measure of the likelihood and impact to DOE should the risk occur (regardless of the strength of the controls to mitigate the risk).</p> <p>In the FMA Module, this is a professional judgment rating of High, Moderate, Low, or Not Relevant (NR). The NR rating is for corporately defined risks that may not impact all organizations. No assessment is required with a rating of NR, although a short rationale will need to be provided.</p> <p>General environment: Environment that assumes no mitigating controls are in place.</p> <p>Likelihood: The measure of the relative potential that the risk might occur given the general environment.</p> <p>Impact: The measure of the magnitude and nature of the effect the risk might cause given the general environment.</p>



**Federal Managers’
Financial Integrity Act
(FMFIA)**

Federal Act that requires ongoing evaluations and reports of the adequacy of the systems of internal accounting and administrative control of each executive agency (including DOE). DOE Order 413.1b, *Internal Control Program*, requires the Department to establish and maintain an internal control program to evaluate internal controls and report the status of significant issues up through the chain of command to the President and Congress. To support Departmental reporting, Heads of organizations, including the National Nuclear Security Administration (NNSA), are required to report on the status of the organization’s internal controls, including reportable issues identified and progress made in correcting prior reportable issues.

FMFIA provides for:

- Evaluation of an agency’s internal controls in accordance with Government Accountability Office (GAO) standards;
- Annual reporting by the head of each executive agency to the President;
- Identification of material weaknesses and the plans for correcting them; and,
- Agencies to provide for internal control assessments on an on-going basis.

**Federal Financial
Management
Improvement Act
(FFMIA)**

Federal Act that requires each agency to implement and maintain financial management systems that comply substantially with the:

- Federal financial management systems requirements;
- Applicable Federal accounting standards; and,
- United States Government Standard General Ledger (USSGL) at the transaction level.

**Financial Management
Assessment (FMA)
Evaluation**

An evaluation of internal controls over reporting that tests an entity’s controls in order to provide assurance on the effectiveness and efficiency of operations, reliability of financial reporting, and compliance with applicable laws and regulations.

**Financial Management
Assessment (FMA)
Module**

The central location for documenting the evaluation of the relevant financial business processes, sub processes, and risks facing each reporting entity, as well as the key controls and testing information for each process that are relied upon to mitigate the risks.

Financial Management Systems

OMB Circular A-123, Appendix D, *Compliance with the Federal Financial Management Improvement Act of 1996*, defines a “financial management system” as including “an agency’s overall financial operation, reflecting the people, processes, and technology to capture, classify, summarize, and report data in a meaningful manner to support business decisions, including hardware, applications and system software, personnel, procedures, data, and reporting functions. The financial management system may fully integrate with other management information systems (i.e., mixed systems) where transactions automatically flow into an accounting general ledger. The financial management system could also include manual processes to post transactions from other management systems into the accounting general ledger.”

The financial system encompasses processes and records that:

- Identify and record all valid transactions;
- Describe on a timely basis the transactions in sufficient detail to permit proper classification of transactions for financial reporting;
- Measure the value of transactions in a manner that permits recording the proper monetary value in the financial statements; and
- Determine the time period in which transactions occurred to permit recording of transactions in the proper accounting period.”

Financial Management Systems (FMS) Evaluation

In accordance with the FMFIA, entity owners of a financial management system included in the Department’s FMS Inventory, and users of an FMS, are required to conduct an FMS Evaluation as part of the annual internal controls evaluation process.

Focus Area

Specific areas of emphasis which require additional assessment in the FMA Module.

Improper Payment

When the payment funds go to the wrong recipient, the recipient receives the incorrect amount of funds, or the recipient uses the funds in an improper manner resulting in unintentional payment errors or intentional fraud and abuse.

Interim Internal Controls Status (IICS) Assessment

A questionnaire that provides a mid-year update confirming that annual non-financial and financial risk assessments are being performed, risk exposure ratings updated, corrective actions are being taken on any significant issues identified in the current or prior year assessments, and whether any issues have been identified that would rise to the level of a significant deficiency or material weakness.

Internal Control

An integrated component of management that provides reasonable assurance that the following objectives are being achieved:

- Effectiveness and efficiency of operations;
- Reliability of reporting; and
- Compliance with applicable laws and regulations.

Inherent Risk	The exposure arising from a risk before any action is taken to manage it.
Inquiry	A detailed discussion with knowledgeable personnel to determine if controls are in place and functioning
Inspection	Scrutiny of specific business processes and documents through consideration and analysis for approval authorities that indicate the effectiveness of controls.
Key Control	A control or set of controls that address the relevant assertions for a material activity or significant risk. At the point that management is ready to test controls, and in order to focus test work, management must identify the key controls in place.
Kickbacks and Gratuities	Contractors making undisclosed payments to agency officials or other government contractors or giving something of value to reward a business decision.
Local Risk	A risk in the FMA that is added by a reporting organization because the risk is applicable to that organization and the risk is not captured in a corporate risk
Material Non-conformance	Exists when <i>financial systems</i> do not substantially comply with federal financial management system requirements or where control deficiencies impact financial systems' ability to comply. The EA Module defines the conformance criteria and captures identified non-conformances.
Material Weakness	<p>A significant deficiency that the Entity Head determines to be significant enough to report outside of the Entity as a material weakness. There are four types:</p> <p>Material Weakness in Internal Control Over Operations – Includes, but is not limited to, conditions that:</p> <ul style="list-style-type: none"> • Impact the operating effectiveness of Entity Level Controls; • Impair fulfillment of essential operations or mission; • Deprive the public of needed services; and • Significantly weakens established safeguards against fraud, waste, loss, unauthorized use, or misappropriation of funds, property, other assets, or conflicts of interest. <p>Material Weakness in Internal Control Over Reporting – A significant deficiency, in which the Entity's Head determines significant enough to impact internal or external decision-making and reports outside of the Entity as a material weakness.</p> <p>Material Weakness in Internal Control Over Financial Reporting – A significant deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.</p>

Material Weakness in Internal Control Over Compliance – A condition where management lacks a process that reasonably assures preventing a violation of law or regulation that has a direct and material effect on financial reporting or significant effect on other reporting or achieving Entity objectives.

Major/Integrated Contractors

DOE contractors with responsibility for the management and/or operation of a Department-owned or leased facility.

Misrepresentation of Eligibility

Contractors purposefully reporting incorrect information in bid proposal to falsely claim eligibility to perform the work, such as status as a small business

Minimum Evaluation Standard

The basis by which testing cycles for the FMA Evaluation are determined. The minimum evaluation standard is based on the combined risk rating of risks identified both corporate risks automatically populated by the FMA Module and local risks identified by the individual entity for each standard process and sub-process. Controls for processes that have risks with a combined risk rating of High are tested each year. Controls for a process that has risks with a combined risk rating of Moderate are tested at least once every two years. Controls for processes that have risks with a combined risk rating of **Low** are tested at least once every three years.

All controls in all business processes and sub-processes must be on a three-year testing cycle, including processes with a Low exposure rating and no control risk rating. If an organization has not tested a control in the past two years, the control will receive testing in the current year.

Mitigate

To put controls in place that would reduce the probability or impact of a given risk from being realized.

Mixed System

OMB Circular A-123, Appendix D, *Compliance with the Federal Financial Management Improvement Act of 1996*, defines as a “hybrid of financial and non-financial portions of the overall financial management system.”

Non-Conformance

Exists when the Entity has identified potentially significant deficiencies in the scope of the internal controls’ evaluations conducted, which would warrant disclosure to assure limitations are understood

OMB Circular A-123 Observation

Prescribes guidance for internal control and risk management requirements. The viewing of a specific business process in action, and in particular the control activities associated with the process, to test the effectiveness of an internal control.

Payment Integrity Information Act (PIIA)

Federal act requiring agency leaders to assess and identify high-risk or otherwise significant programs and activities and share these findings in an annual publication.

Payroll Schemes	Contractors obtaining payment through submission of false claims for compensation, such as misrepresenting employee labor in order to charge for more work hours and increase profit.
Procure to Pay (P2P)	The cycle comprises the purchasing and payment processes including Acquisition Management; Inventory Management; Payables Management; and Travel Administration. Specific areas involved in this cycle are approving requisitions, issuing RFP's, maintaining, and selecting vendors, awarding contracts, maintaining obligations, receiving and managing goods or services, approving and paying invoices, tracking funds, monitoring continuing resolutions, and managing travel and purchase cards.
Product Quality	Contractors purposefully conducting work in a way that results in the delivery of goods of a lesser quality than required by the contract.
Projects to Assets (P2A)	The cycle comprises processes related to the oversight of projects resulting in an asset and the management of project costs and property. Processes included in this cycle are Project Cost Management, and Property Management. Specific areas that fall within this process cycle are managing large projects including capturing all costs and managing to budget; capturing costs for reimbursable expenses; creating and monitoring assets; monitoring depreciation; and controlling property.
Quote to Cash (Q2C)	The cycle comprises processes related to working capital management and capturing revenue as a receivable to be managed and collected. The cycle consists of Revenue Management and Receivable Management processes. Specific areas that fall within this process cycle include invoicing for reimbursable expenses, along with other expected revenues through to managing accounts receivable and receiving cash.
Reasonable Assurance	Judgment by management based upon available information that the systems of internal controls are operating as intended under FMFIA.
Remediation Activity	An action put in place that would address the correction of a control deficiency identified through an internal controls assessment.
Re-performance	An objective execution of procedures or controls performed as part of a test of the effectiveness of the entity's internal control.
Residual Risk Risk Assessment	The amount of risk that remains after action has been taken to manage it A systematic process of evaluating the potential risks that may impact the ability of an organization to achieve objectives or goals.

Risk Factor	Identification of changes that may affect the exposure risk or effectiveness of existing controls in mitigating the risk. Risk factors include system, process, organization, or other changes (e.g., Inspector General (IG) or GAO audits).
Risk Profile	A prioritized inventory of the most significant risks identified that the Agency faces toward achieving its strategic objectives arising from its activities and operations and identifies appropriate options for addressing significant risks.
Risk Register	An inventory of potential risks the Agency may face when striving to achieve its strategic objectives.
Risk Response	<p>A determination by management on how a risk should be managed, considering the potential impact of the risk and the likelihood of occurrence, as well as the cost associated with mitigating the risk.</p> <p>Types of risk responses:</p> <p><i>Acceptance</i> Take no action to respond to the risk based on insignificance of risk, requirement to complete the work, or benefits and opportunities exceed the risk</p> <p><i>Avoidance</i> – Action is taken to stop the operational process, or the part of the operational process causing the risk.</p> <p><i>Reduce</i> – Action is taken to reduce the likelihood or impact of the risk.</p> <p><i>Share</i> – Action is taken to share the risks with another entity within the organization or with one or more external parties.</p> <p><i>Transfer</i> – Action to transfer the responsibility for ownership and handling the risk to an organization other than the current entity that owns the risk.</p>
Risk Tolerance	The level of variation in performance that management is willing to accept, relative to achieving objectives. Management should establish its risk tolerance level before the placement of controls.
Sabotage	The intentional and deliberate destruction of property or the obstruction of an activity.
Sampling	<p>Used to select the appropriate number of transactions to test for each control. Sampling methods for consideration are:</p> <ul style="list-style-type: none"> • Random- A method of selecting a sample whereby each item in the population of transactions is given an equal chance of selection regardless of the population size. • Judgmental- A method of sample selection whereby the sampled items are selected based on a deliberate choice based on the profile of the population of transactions. This method provides validation

that high-risk or other items of interest are included in the selected sample and reviewed as part of testing the control.

- **Systematic-** A method of sample selection whereby a uniform interval is selected throughout the population. The appropriate interval is determined by dividing the number of items in the population by the sample size.

Scope Limitation	Exists when the entity has identified potentially significant deficiencies in the scope of the internal control evaluations conducted, which would warrant disclosure to assure limitations are understood. Scope limitations may be determined by the entity or may be required by the Office of the Chief Financial Officer (OCFO) in certain circumstances.
Significant Deficiency	A deficiency or a combination of deficiencies in internal control that is less severe than a material weakness yet important enough to merit attention by those charged with governance.
Special Purpose (SPC)	The cycle comprises processes which are unique and cannot be categorized under other process cycles. These processes require significant attention due to the impact on the financial statements and scope of responsibility. The cycle consists of the Environmental Management (EM) Liability process.
Standard Process	A business process that is pre-populated in the FMA Module.
Standard Sub-process	A sub-component of a standard process, also pre-populated in the FMA Module.
Statement of Assurance	Annual statement required by FMFIA and included in the DOE Agency Financial Report (AFR) that represents the Secretary's informed judgment as to the overall adequacy and effectiveness of DOE internal controls. The AFR reports the results of evaluations made on DOE entity, financial, and financial management systems controls, including identified material weaknesses or material non-conformances and corrective action progress made on existing material weaknesses and material non-conformances.
Testing Activity	Procedure to determine if internal control systems work in accordance with internal control objectives.
Theft	Contractors stealing or misappropriating government resources, such as cash or other assets.
Vandalism	The mindless and malicious harm and injury to another's property.