

A report to congressional requesters

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**What GAO Found**

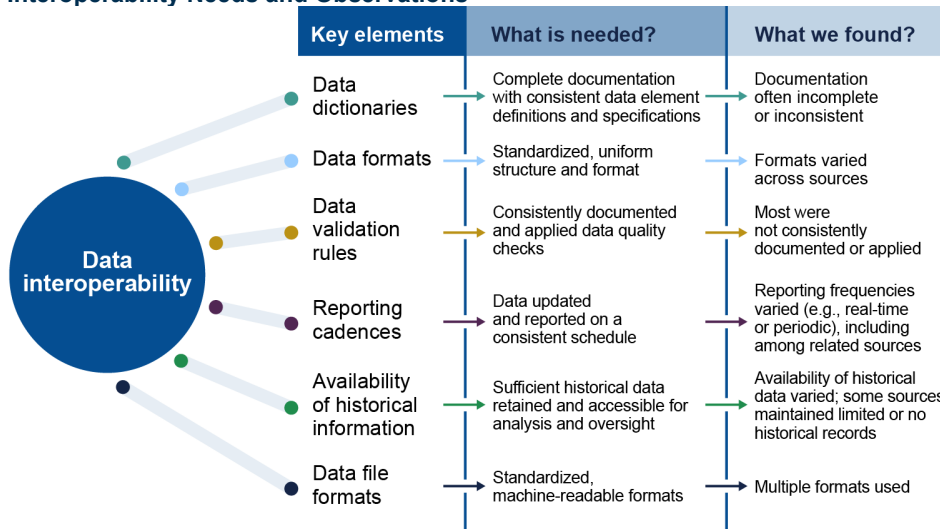
Agencies can use more than 100 federal data sources—or a combination of them—to verify if recipients meet the eligibility criteria for federal programs throughout the award life cycle (which includes pre-award screening, post-award monitoring, and payment validation). As of September 2025, these included 28 data sources in the Do Not Pay working system (DNP) or designated for inclusion in DNP. However, weaknesses in data interoperability may hinder agencies’ ability to efficiently determine award and payment eligibility.

**Data interoperability** is the ability to share and disseminate standardized data in a way that is efficient, consistent, and accessible across different systems and users, for which high-quality data are essential. Without it, the risk of improper awards or payments increases, and the potential use of artificial intelligence and advanced analytics to assist agencies in making eligibility determinations is limited.

GAO found that, for more than 30 years, several laws and guidance have established general requirements related to data interoperability but have not established specific requirements for enforcing interoperability, such as for recipient eligibility data, throughout the federal government. Many of the data sources GAO identified, including those in DNP, were created to comply with legal requirements or to manage specific federal programs—not to support eligibility determinations for other agencies.

GAO also found a variety of obstacles and challenges that can affect the interoperability of the nine selected data sources that agencies may use for eligibility determinations (see figure).

**Summary Comparison of Key Elements GAO Assessed to Eligibility Data Interoperability Needs and Observations**



Source: GAO. | GAO-26-107466

GAO also found that insufficient or improperly documented validation rules contributed to data quality issues. All nine selected data sources had data quality

**Why GAO Did This Study**

Government agencies are responsible for ensuring that data, including those needed to determine whether entities are eligible to receive federal awards and funds, are interoperable and reliable. Having interoperable data among agencies and data sources is crucial to improving the federal government’s efforts to detect and prevent improper payments. The Payment Integrity Information Act of 2019 requires executive agencies to take actions to reduce improper payments, such as using DNP to ensure that they make awards and payments only to eligible recipients.

GAO was asked to review how the government can better leverage USAspending.gov and other data sources to help enhance monitoring of federal spending and potential fraud, waste, and abuse. This report describes (1) federal data sources agencies may use to verify award recipient’s eligibility, (2) the extent to which selected eligibility data sources are interoperable, and (3) the extent to which eligibility data can be matched with USAspending.gov post-award information to analyze potentially ineligible recipients.

To conduct this review, GAO

- reviewed laws, regulations, OMB guidance, and relevant federal agencies’ websites and documentation to identify federal data sources that agencies can use to determine award recipients’ eligibility;
- reviewed laws, regulations, policies, and OMB guidance related to data interoperability to identify requirements;
- judgmentally selected nine eligibility data sources that were publicly available, in DNP or designated for inclusion in DNP, and included information about entities;

issues (e.g., missing, invalid, and duplicate data), and seven data sources had inconsistencies between them, such as overlap in mutually exclusive data. These data quality issues undermine data reliability and interoperability for agencies seeking to make eligibility determinations.

To determine the extent to which eligibility and award data could be linked to help agencies identify whether potentially ineligible entities had received federal awards, GAO partially linked two data sources—System for Award Management (SAM) entity information and SAM Exclusion records—with USAspending.gov awards based on the unique entity identifiers (UEI). Most USAspending.gov award recipient UEIs could be linked to SAM entity information. However, most SAM Exclusion records, which identify parties excluded from receiving federal benefits and awards, such as contracts, did not have a UEI because this data source does not always require them. For the SAM Exclusion records with a UEI, GAO identified 2,074 awards to recipients that were listed in the data source at the time of the transaction. However, these matches by themselves do not indicate that the awards were improper or involved fraud, waste, or abuse. Making this determination requires specific evaluation of each case.

The inability to fully analyze SAM Exclusions and USAspending.gov data is an example of government-wide issues with data matching for recipient eligibility determinations. While analysis based on unique identifiers can support eligibility determinations, such identifiers might not always be required or available. Improved data interoperability—including standardized data elements and increased interoperability of data elements, such as names and addresses across data sources and agencies—could enable more comprehensive and efficient data matching. This would improve the government’s ability to identify potentially ineligible recipients.

In addition, several federal agencies and cross-agency groups support best practices for data management and interoperability. However, there is no data governance agency designated to establish and enforce mandatory data interoperability requirements to support recipient eligibility determinations. This has led to fragmented and inconsistent data management efforts that rely on agencies’ voluntary adoption.

Congress could help improve government-wide data interoperability for recipient eligibility data by assigning a single agency a lead role in establishing and implementing data interoperability requirements for recipient eligibility data sources. Based on its role supporting agencies in their efforts to prevent and detect improper payments and operating systems that collect, validate, and use financial, award, spending, and payment data, the Department of the Treasury could be assigned the explicit authority to establish and implement mandatory government-wide data standards and interoperability requirements for recipient eligibility data sources. Treasury could then work with the Chief Data Officer (CDO) Council and the Office of Management and Budget (OMB) to implement the requirements. Not having a data governance agency will contribute to unreliable reporting and inefficiencies as agencies attempt to determine recipient eligibility, and it will limit the government’s ability to leverage artificial intelligence and advanced analytics to identify and prevent improper awards and payments.

- reviewed agencies’ data dictionaries and documentation of validation processes about the selected eligibility data sources for consistency with interoperability practices GAO identified;
- tested data for fiscal years 2023 and 2024 for data quality issues, such as missing and invalid values, consistency, and comparability based on specifications established by the data owners and GAO’s professional judgment;
- interviewed officials at Treasury, the General Services Administration, and the Department of Health and Human Services’ Office of Inspector General because they own the selected data sources; and
- linked SAM data sources with USAspending.gov award information using UEI.

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## What GAO Recommends

GAO recommends that Congress consider assigning a single agency, such as Treasury, explicit authority to lead, in coordination with the CDO Council and in consultation with the OMB—and others, as needed—the development and implementation of government-wide data standards and interoperability requirements for recipient eligibility data sources. These sources include relevant financial, award, spending, and payment data needed to support eligibility determinations throughout the award life cycle. In its comments, the Bureau of the Fiscal Service agreed with the findings of GAO’s report and stated that, to be successful in setting government-wide data standards, Treasury would require clear authority to lead standardization related to eligibility data that are designated for use in DNP. OMB did not provide comments.