Federal Election Commission

Office *of the* Inspector General

FY 2024 Work Plan

October 13, 2023

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Message from the Inspector General

It is with great pleasure that I present the Federal Election Commission (FEC) Office of Inspector General's (OIG) Fiscal Year (FY) 2024 Work Plan. This work plan was developed based on the results of the OIG annual risk assessment and staff planning sessions.

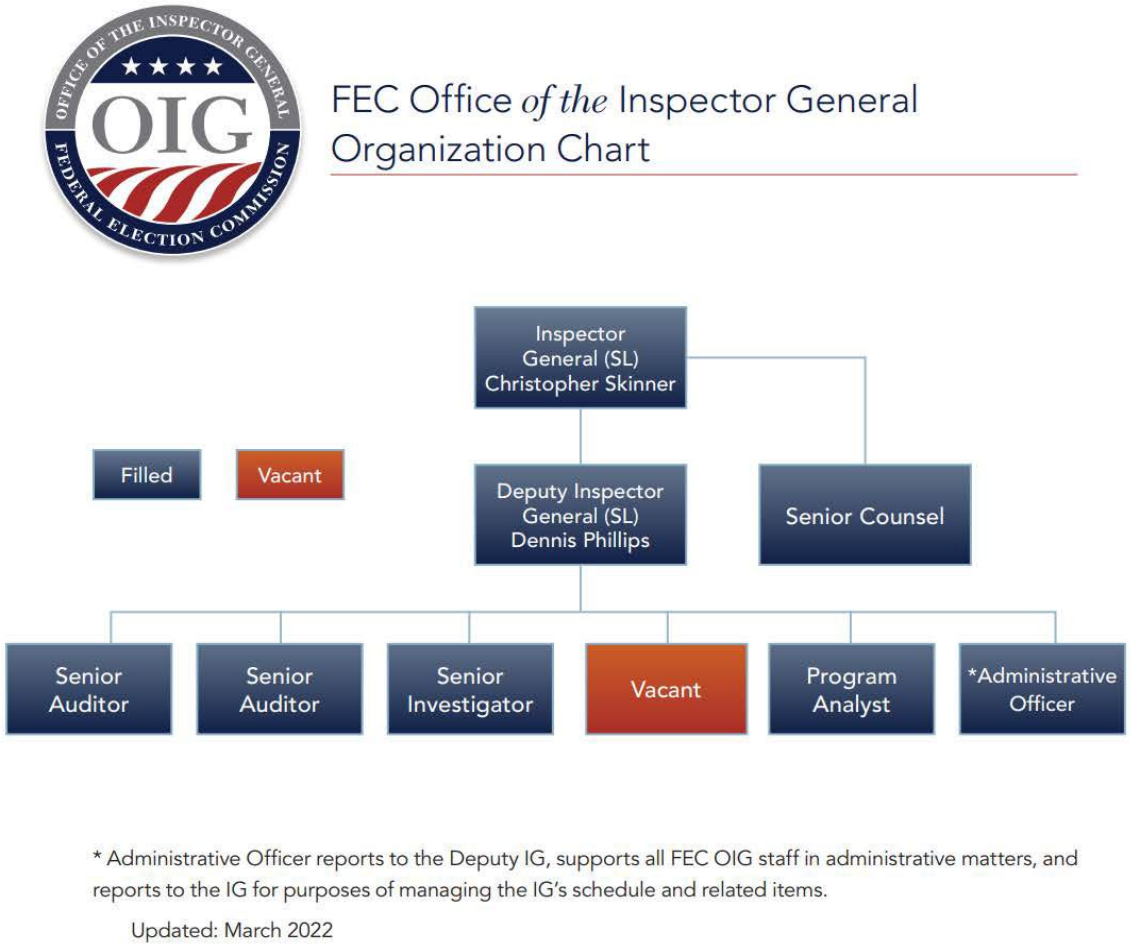
This plan provides the OIG's strategy for identifying and prioritizing issues and managing its workload and resources for FY 2024. It identifies our mandated and discretionary engagements for FY 2024 as well as our continuing projects from FY 2023. Successful execution of this plan will enable the OIG to provide high quality work products to its stakeholders and assist the FEC to ensure its resources are expended in a responsible and reasonable manner.

The OIG audit, evaluation, and investigative programs accomplished much of the work planned in FY 2023, which included, among other things, an audit of the FEC's human capital management program, a review of the travel and purchase card program, responding to hotline complaints, and investigating allegations of wrongdoing. In FY 2024, the OIG plans to conduct three audits, (two via contractual agreement), two evaluations of FEC operations and programs, one ongoing review of Commission Directives as well as respond to hotline complaints and investigate allegations of wrongdoing.

Going forward, the FEC OIG remains committed to conducting audits, evaluations, and investigations to strengthen the agency's internal controls, addressing hotline complaints, resolving outstanding recommendations, and ensuring that the FEC and OIG programs evince a high level of integrity, which is fundamental to who we are as an agency. Additionally, the OIG is dedicated to improving and streamlining its internal processes to improve the overall support to the agency. I look forward to a successful year of providing the highest quality support and service to all OIG stakeholders.

Christopher Skinner
Inspector General

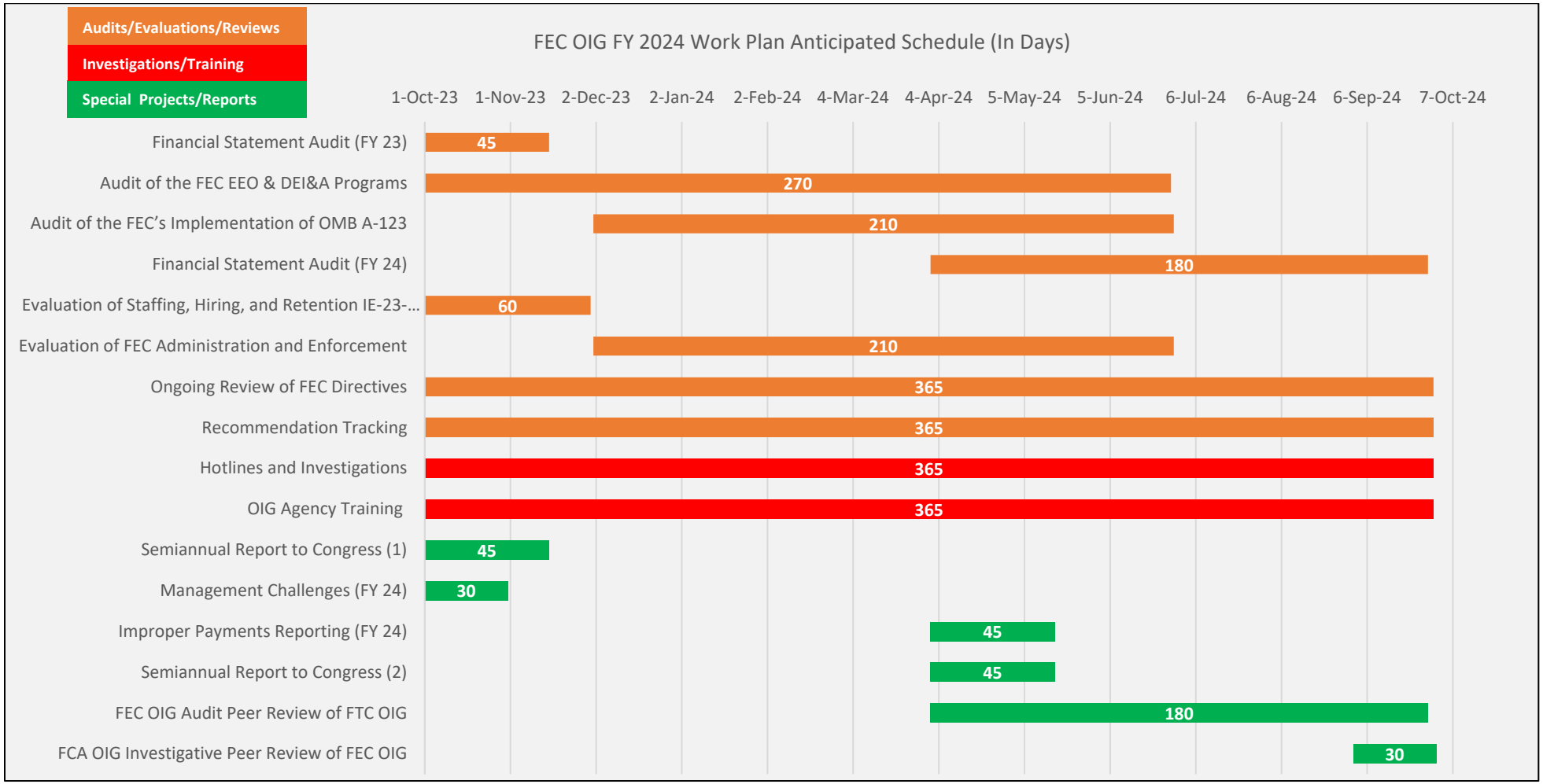
FEC Office of Inspector General Organization Chart



* Administrative Officer reports to the Deputy IG, supports all FEC OIG staff in administrative matters, and reports to the IG for purposes of managing the IG's schedule and related items.

Updated: March 2022

OIG FY 2024 Work Plan Anticipated Schedule



Introduction

The FEC Office of Inspector General (OIG) prepares and implements an annual work plan to ensure its resources are effectively and efficiently utilized throughout the performance year. We recognize that priorities and resources may shift throughout the performance year but provide this plan as a baseline to our stakeholders. As a result, the FY 2024 OIG work plan is divided into four broad categories:

(1) Audits, Evaluations, and Special Reviews
(2) Investigations
(3) Special Projects and Reports
(4) Internal Administration

Audits, evaluations, and special reviews of FEC programs and operations determine if programs and operations are compliant, efficient, and effective. Audits and reviews can be narrow in scope or broadly defined depending on the topic. Evaluations may be used to provide factual and analytical information; monitor compliance; measure performance; assess the efficiency and effectiveness of programs and operations; share best practices; and inquire into allegations of fraud, waste, abuse, and mismanagement. The OIG provides a final report to the Commission and senior leaders that recommends improvements to agency operations. Final reports are public documents and are available on the OIG webpage (https://www.fec.gov/oig/).

OIG investigations analyze allegations that concern FEC personnel, programs, and operations, to prevent and detect fraud, waste, abuse, mismanagement, and related misconduct. OIG investigators analyze complaints from employees, contractors, and concerned members of the public to determine if the complaints allege violations of law, regulation, or policy and whether they impact FEC programs or operations. The subjects of OIG investigations may include agency employees, FEC contractors, consultants, and any persons or entities involved in alleged wrongdoing affecting FEC programs and operations. OIG investigations may address administrative, civil, and criminal violations of laws, regulations, and policies. Investigative summaries are public documents and are available on the OIG webpage (https://www.fec.gov/oig/).

Special projects and reports may include, but are not limited to, projects the agency head has requested the OIG evaluate, mandated reporting requirements (*i.e.*, semiannual reports, improper payments reporting, and management challenges reporting), review of agency legislation, peer reviews, and miscellaneous assignments and requests from the OIG community.

Internal administration includes, among other things:

- ***CIGIE Community and professional certifications***: Actions including, but not limited to, participation in CIGIE training events, working groups, and committees/sub-committees. Topics include, among other things, information technology, legislation, audits, enterprise risk management, and investigations. Each plays a vital role in the accomplishment of the OIG mission.

- ***OIG vacancies***: The OIG currently has one vacant position, and we plan to fill the vacant position (pending budget requirements) in FY 2024 to ensure the OIG is fully staffed to implement this Work Plan, as well as continue to increase effectiveness and efficiency within the office.

Audits, Evaluations, and Special Reviews

The term "audit" is used to describe work performed by auditors in examining financial statements, as well as work performed in reviewing compliance with applicable laws and regulations, the economy and efficiency of operations, and the effectiveness in achieving program results. Audits are prepared in accordance with generally accepted government auditing standards and vary in scope and complexity. In addition, the OIG may elect to conduct audits which emphasize root cause analysis in addition to compliance. The FEC OIG is currently staffed with two senior auditors.

Additionally, the OIG may conduct an evaluation. An evaluation is a systematic and independent assessment of the design, implementation, and/or results of an agency's operations, programs, or policies. Evaluations can be used to determine efficiency, effectiveness, impact, and/or sustainability of agency operations, programs, or policies. Evaluations are conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation* (Blue Book).

The OIG may conduct special reviews, which can be limited scope or short-term reviews, evaluations, and studies of FEC programs or operations. Similar to an audit or evaluation, the objective of a special review is to provide management a value-added report that identifies systemic deficiencies and opportunities for improvement.

The OIG plans to conduct the following audits, evaluations, and special reviews in FY 2024:

1. Audit of the Federal Election Commission's FY 2023 and FY 2024 Financial Statements

In accordance with the Accountability of Tax Dollars Act of 2002, the FEC is required to prepare annual financial statements in accordance with Office of Management and Budget (OMB) Circular No. A-136, Financial Reporting Requirements. The Chief Financial Officers Act of 1990, as amended, requires the FEC IG or an independent external auditor selected by the IG to audit the agency's financial statements.

The FEC OIG will contract and provide oversight to the FY 2023 and 2024 financial statement audits. An independent accounting firm, Brown & Company, is conducting the FY 2023 Financial Statement Audit. The OIG is responsible for, among other things:

(1) Reviewing the auditor's approach and planning of the audit
(2) Evaluating the qualifications and independence of the auditors
(3) Monitoring the work of the auditors
(4) Examining audit documents and reports to ensure compliance with government auditing standards, and OMB Bulletin No.17-03, Audit Requirements for Federal Financial Statements
(5) Other procedures the OIG deems necessary to oversee the contract and audit

2. Audit of the Federal Election Commission's Equal Employment Opportunity (EEO) and Diversity, Equity, Inclusion, and Accessibility (DEI&A) Programs: OIG-23-02

The objectives of this performance audit include assessing the FEC's EEO compliance with statutory requirements, applicable EEOC and OPM guidance, best practices, as well as applicable agency policies and procedures and analyzing FEC's implementation of diversity and inclusion efforts related to the workforce to identify positions, and increase racial, ethnic, and gender diversity in the workforce.

3. Audit of the FEC's Implementation of OMB A-123

The FEC OIG will conduct a performance audit of the FEC's implementation of OMB A-123 requirements. This will be a follow-up audit to the *Inspection of FEC's Compliance with FMFIA/OMB Circular A-123* that was conducted in FY 2014 before the new A-123 guidance became effective in June 2016. The audit will assess FEC's compliance with OMB A-123 and determine the effectiveness of its internal control and Enterprise Risk Management programs.

4. Evaluation of Staffing, Hiring, and Retention at the FEC: IE-23-01

In January 2023, the OIG initiated an evaluation of staffing and human resource (HR) issues at the FEC. The backdrop for this evaluation is that staffing levels at the FEC have persistently declined despite significant growth in federal campaign funding and corresponding workload. Impacts include the FEC's reduction of certain performance benchmarks and adverse effects on agency performance. This evaluation provides baseline measures and descriptive statistics that relate to FEC staffing including retention, separations, hiring, budgeting, and resource constraints. The evaluation also considers factors that have adversely impacted the FEC's ability to secure funding levels that would enable the agency to obtain and maintain adequate staffing levels. Other topics include HR resourcing relative to comparable agencies, time to hire, an analysis of projected FY 2024 shortfalls in personnel budget, and a look at agency success and challenges in diversity, equity, inclusion, and accessibility.

5. Evaluation of FEC Administration and Enforcement

The FEC OIG will conduct an evaluation of FEC administration and enforcement. The review will consider the extent and nature of current and historical campaign finance issues in relation to FEC activity including issue identification, investigation, and enforcement activity. Programs include the Matters Under Review process, Alternative Dispute Resolution Process, Administrative Fines Program, and referrals for potential criminal investigation. The review will consider administration and enforcement activity in the context of rapidly increasing campaign contribution totals and transaction volumes. Where relevant, the review will identify constraints and challenges in resources, processes, and organization.

6. Ongoing Review of FEC Directives

The OIG will conduct a review of FEC Directives in accordance requirements of the IG Act.

7. Recommendation Tracking

A critical responsibility of the OIG is to follow-up on previously issued audit, special review, and investigative reports to ensure outstanding recommendations are resolved. The OIG previously provided the Commission with a semiannual report of outstanding recommendations that contained details of the follow-up work conducted by the OIG and the status of each recommendation. We continue to communicate and work with management regarding the outstanding recommendations (20 total as of September 22, 2023).

Recommendation follow up in FY 2024 involve the following responsibilities:

1) Review implemented recommendations to ensure the findings have been resolved
2) Review and comment on management's corrective action plans that detail plans for resolving outstanding recommendations
3) Conduct periodic meetings with management to discuss progress in implementing recommendations

The OIG anticipates expending its resources to the audit, evaluation, and special review functions for the following time periods of performance in FY 2024:

- **Financial Statement Audit FY 2023**:[1] October 2023 – November 2023 (45 + days)
- **Audit of the FEC EEO & DEI&A Programs:** October 1 – June 2024 (270 days)
- **Audit of the FEC's Implementation of OMB A-123**: December 2023 – July 2024 (210 days)
- **Financial Statement Audit FY 2024**: April 2024 – September 2024 (180 + days)
- **Evaluation of Staffing, Hiring, and Retention at the FEC**:[2] October 2023 (60 days)
- **Evaluation of FEC Administration and Enforcement**: December 2023 – July 2024 (210 days)
- **Ongoing Review of FEC Directives**: October 2023 – September 2024 (365 days)
- **Recommendation Tracking**: October 2023 – September 2024 (365 days)

[1] The timelines associated are limited to the FY 2024 schedule. For instance, the FY 2023 Financial Statement Audit was initiated in April 2023 and will require 225 days in total to complete.

[2] The timelines associated are limited to the FY 2024 schedule. For instance, this Evaluation was initiated in January 2023 and will require 305 days in total to complete.

Investigations and Training

The OIG's investigative program aims to add value to the agency's programs and operations by objectively investigating allegations of fraud, waste, abuse, misconduct, and mismanagement. The subjects of OIG investigation may include agency employees, FEC contractors, consultants, and persons or entities involved in alleged wrongdoing affecting FEC programs and operations. The OIG pursues facts related to allegations of wrongdoing to determine if a violation of law, regulation, or policy occurred. OIG investigations may address administrative, civil, and criminal violations and investigative results may lead to administrative, civil, and criminal penalties and recoveries.

1. Manage Hotline Complaints and Investigation Caseload

The OIG Hotline Portal provides a means for FEC employees, FEC contractors, and the public to communicate directly and confidentially with the OIG. All allegations and referrals of fraud, waste, abuse, misconduct, and mismanagement involving FEC employees, contractors, agency programs, operations, and property, are termed "hotline complaints" per OIG policy. The OIG takes all complaints seriously; as such, OIG personnel carefully analyze all complaint details to determine if an investigation is warranted. Other courses of action include, but are not limited to, referral to FEC management for action, referral to another existing program/process (e.g., EEO, HR), referral to another agency, referral to the audit or special review process, or closure and dismissal with no further action.

The OIG will continue to thoroughly analyze each complaint and respond accordingly. Additionally, we plan to continue to address open investigations until a resolution is determined. The identities of complainants and witnesses will be protected pursuant to the IG Act.

2. OIG Agency Training

The OIG will continue to participate in the FEC new employee orientation program to educate all new employees about the mission of the OIG. We continue to update and revise the public web page to better educate the public on our mission objectives.

Additionally, the OIG will continue to submit the OIG Quarterly Newsletter to all FEC staff in efforts to educate and inform staff on OIG principles and key projects and initiatives.

The OIG anticipates expending its resources to address all investigation initiatives for the time periods of performance as follows:

- **Hotlines and Investigations**: October 2023 – September 2024 (365 days)
- **OIG Agency Training**: October 2023 – September 2024 (365 days)

Special Projects and Reports

To enhance the effectiveness of the OIG and to ensure effective audit and investigative coverage of the Commission's programs and operations, the OIG aims to operate within the objectives identified in its FY 2021 – FY 2025 Strategic Plan. Additionally, the OIG is required to complete and submit mandated reporting assignments throughout the year. The following strategic plan initiatives and additional reporting requirements are planned for FY 2024:

1. Semiannual Reporting

In accordance with the IG Act, the OIG will prepare and submit semiannual reports to Congress summarizing the work completed for the reporting period. Semiannual reports summarize OIG activities during the immediately preceding six-month periods ending March 31 and September 30 of each year.

2. Management Challenges for FY 2024

The OIG submits an annual Management Challenges report highlighting the current challenges facing the agency, which is provided in the annual Agency Financial Report.

3. Improper Payments Reporting for FY 2023

The OIG is required to conduct an annual review of FEC's compliance with the Payment Integrity Information Act of 2019 (PIIA). The Office of Management and Budget (OMB) Circular A-123 requires that each agency's OIG annually review and evaluate whether the agency has published the appropriate improper payments information with the annual Performance and Accountability Report (PAR) or Annual Financial Report (AFR) and accompanying materials for the most recent fiscal year. In addition, each OIG is to determine if the agency has complied with the PIIA and other applicable payment integrity guidance. The OIG is required to report the results to the Senate Committee on Homeland Security and Governmental Affairs; the House Committee on Oversight and Reform; the House and Senate Committee on Appropriations; the Comptroller General; and OMB.

4. Peer Review Program

Audit and investigative programs of Federal OIG's are required to be peer-reviewed once every three years. The FEC OIG is scheduled to conduct a peer review of the Federal Trade Commission (FTC) OIG audit program in FY 2024. Similarly, OIG investigative functions are required to be peer reviewed. Accordingly, the Farm Credit Administration (FCA) OIG is scheduled to conduct a peer review of the FEC OIG investigative program in the fall of 2024.

The OIG anticipates expending its resources to complete the special projects and work reporting requirements for the following time periods of performance:

- **Semiannual Report to Congress (1)**: October 2023 – November 2023 (45 days)
- **Management Challenges for FY 2024**: October 2023 (30 days)
- **Improper Payments Reporting FY 2023**: April 2024 – May 2024 (45 days)
- **Semiannual Report to Congress (2)**: April 2024 – May 2024 (45 days)
- **FEC OIG Audit Peer Review of the FTC OIG**: April 2024 – September 2024 (180 days)
- **FCA OIG Investigative Peer Review of the FEC OIG**: September 2024 (30+ days)

Internal Administration

1. Council of Inspectors General on Integrity and Efficiency (CIGIE) Community and Professional Certifications

In addition to the OIG's audit, evaluation, and investigative responsibilities, the OIG participates in numerous CIGIE activities and completes professional certifications. The OIG will participate in several Federal Inspectors General community working groups on topics related to legislation, audits, and investigations. FEC OIG staff prioritize OIG mission requirements prior to attending any non-mandatory meetings or participating in OIG community working groups.

The following are examples of the CIGIE activities and commitments planned by the OIG for FY 2024:

a. Participate in/Attend Professional Working Group and Other Meetings

The IG, Deputy IG, or OIG staff will regularly attend and participate on the following CIGIE professional working group meetings, which include but are not limited to: IG Candidate Panel; Executive Council of CIGIE; CIGIE Professional Development Committee; Budget Committee; Council of Counsels to the Inspector General; Assistant Inspector General for Investigations; Technology Committee, Federal Audit Executive Council (FAEC); CIGIE Enterprise Resource Management (ERM) Working Group; and Financial Statement Audit Network Group.

Additionally, OIG staff will attend the FEC director and town hall meetings, and other meetings associated with the Association of Certified Fraud Examiners and the Institute of Internal Auditors (IIA). FEC OIG staff always prioritize OIG mission requirements prior to attending any non-mandatory meetings or participating in OIG community working groups.

b. Professional Certifications, Development, and Training

The objective of the OIG's training program is to provide cost-effective training to enhance professional understanding and proficiency, and ensure staff meet continuing professional educational requirements. As a result, the OIG staff will attend professional training courses in FY 2024 (pending budget requirements) to continue to develop OIG knowledge, skills, and abilities.

No timelines are attached to CIGIE and professional certifications, as a majority of these tasks are not mandatory.

2. OIG Vacancies

The FEC OIG currently has one (1) vacant position. The OIG anticipates filling the vacant position once funding is available.

Appendix A: Annual Planning and Methodology Strategies

The planning methodology adopted by the OIG is based on a formal risk assessment process, which was conducted in August and September 2023. The purpose of the annual risk assessment process is to better align OIG resources to areas that will provide the most value to the FEC. A risk assessment is a process to identify, assess, respond to, and report on opportunities and threats that affect the achievement of objectives. The OIG also solicits feedback and ideas from stakeholders throughout the year. The annual work plan will require periodic updates to reflect changes, such as new priorities, as well as any changes in OIG resources.

In addition to risk base planning, the OIG's work plan is also designed to yield work assignments that will identify opportunities for economy, efficiency and effectiveness in FEC programs and operations, and detect and prevent fraud, waste, abuse and mismanagement. The priority for conducting work assignments is based on:

1. mandatory legislative requirements
2. emphasis by the President, Congress, and the Commission
3. a program's susceptibility to fraud, manipulation, or other irregularities
4. dollar magnitude of resources involved in the proposed area
5. management needs identified through consultation with primary organization heads
6. changed conditions, or sensitivity of a program or operation
7. the extent of outstanding issues resulting from prior audit coverage or review by the OIG or other oversight body
8. the adequacy of internal control systems in place for the program or other factors
9. stakeholder and reputational risk

Appendix B: Mission Statements

Office of Inspector General

The FEC Office of the Inspector General (OIG) is committed to detecting and preventing fraud, waste, abuse, and other violations of the law, and to promoting economy, efficiency and effectiveness in the operations of the FEC. The OIG strives to collaboratively promote improvements to FEC strategic operations, programs, and initiatives by independently conducting value-added audits, reviews and investigations.

The Federal Election Commission

To protect the integrity of the federal campaign finance process by providing transparency and fairly enforcing and administering federal campaign finance laws.

In 1975, Congress created the FEC to administer and enforce the *Federal Election Campaign Act of 1971,* as amended. The duties of the FEC, an independent regulatory agency, are to disclose campaign finance information, enforce the provisions of the law, and oversee the public funding of Presidential elections.

The Commission consists of six members who are appointed by the President and confirmed by the Senate. Each member serves a six-year term, and two seats are subject to appointment every two years. By law, no more than three Commissioners can be members of the same political party, and at least four votes are required for any official Commission action. The Chairmanship of the Commission rotates among the members each year, with no member serving as Chairman more than once during his or her term.

The FEC Commissioners – Dara Lindenbaum (Chair), Sean J. Cooksey (Vice Chair), Shana M. Broussard, Allen Dickerson, James E. “Trey” Trainor III, and Ellen L. Weintraub.

Appendix C: Core Values

Commitment

We are committed to continually seek personal and operational growth opportunities to preserve the positive reputation of the OIG. We pledge our dedication to persistently enhance our skillsets in efforts to uphold the integrity of the FEC.

Respect

We are devoted to creating a professional and positive work environment in which all colleagues and stakeholders are treated with the utmost respect. We welcome, value, and embrace the diversity of everyone and behave respectfully to all with whom we interact.

Service

We pride ourselves in providing a non-confrontational, value-added service to customers through objective, accurate, and timely evaluations of OIG inquiries in support of FEC operations and procedures.

Honesty

We are honest, fair, and true to ourselves, to each other, and to our customers, which is reflected in our reputation. We behave with the highest levels of integrity, which is fundamental to who we are as a team.

Collaboration

We strive to collaborate and build key relationships within the OIG community and the FEC in order to improve program operations, efficiencies, and effectiveness. We universally work together to identify potential opportunities to partner with OIG stakeholders in efforts to resolve Government wide concerns and maximize the value to the citizens of the United States.

Balance

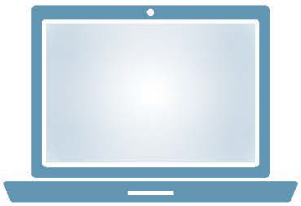
We aim to balance customer needs with the mission of the OIG and FEC while assuring all endeavors of our work reflect transparent and unbiased processes. We apply this practice through our application of due regard for our peers, our beliefs, our family, and our stakeholders.

Appendix D: Hotline Poster

Federal Election Commission
Office *of the* Inspector General

REPORT
FRAUD, WASTE, & ABUSE

OIG Hotline Portal
https://fecoig.ains.com



* Also accessible via:
http://www.fec.gov/oig

OIG Hotline Phone
202-694-1015

* Available from 9:00 a.m. to 5:00 p.m. Eastern Standard Time, Monday through Friday, excluding federal holidays.

Or you may call toll free at 1-800-424-9530 (press 0; then dial 1015). You may also file a complaint by completing the Hotline Complaint Form (**http://www.fec.gov/oig**) and mailing it to: 1050 First Street, N.E., Suite 1010, Washington DC 20463.

Individuals including FEC and FEC contractor employees are encouraged to alert the OIG to fraud, waste, abuse, and mismanagement of agency programs and operations. Individuals who contact the OIG can remain anonymous. However, persons who report allegations are encouraged to provide their contact information in the event additional questions arise as the OIG evaluates the allegations. Allegations with limited details or merit may be held in abeyance until further specific details are reported or obtained. Pursuant to the Inspector General Act of 1978, as amended, the Inspector General will not disclose the identity of an individual who provides information without the consent of that individual, unless the Inspector General determines that such disclosure is unavoidable during the course of an investigation. To learn more about the OIG, visit our Website at: **http://www.fec.gov/oig**.

Together we can make a difference!