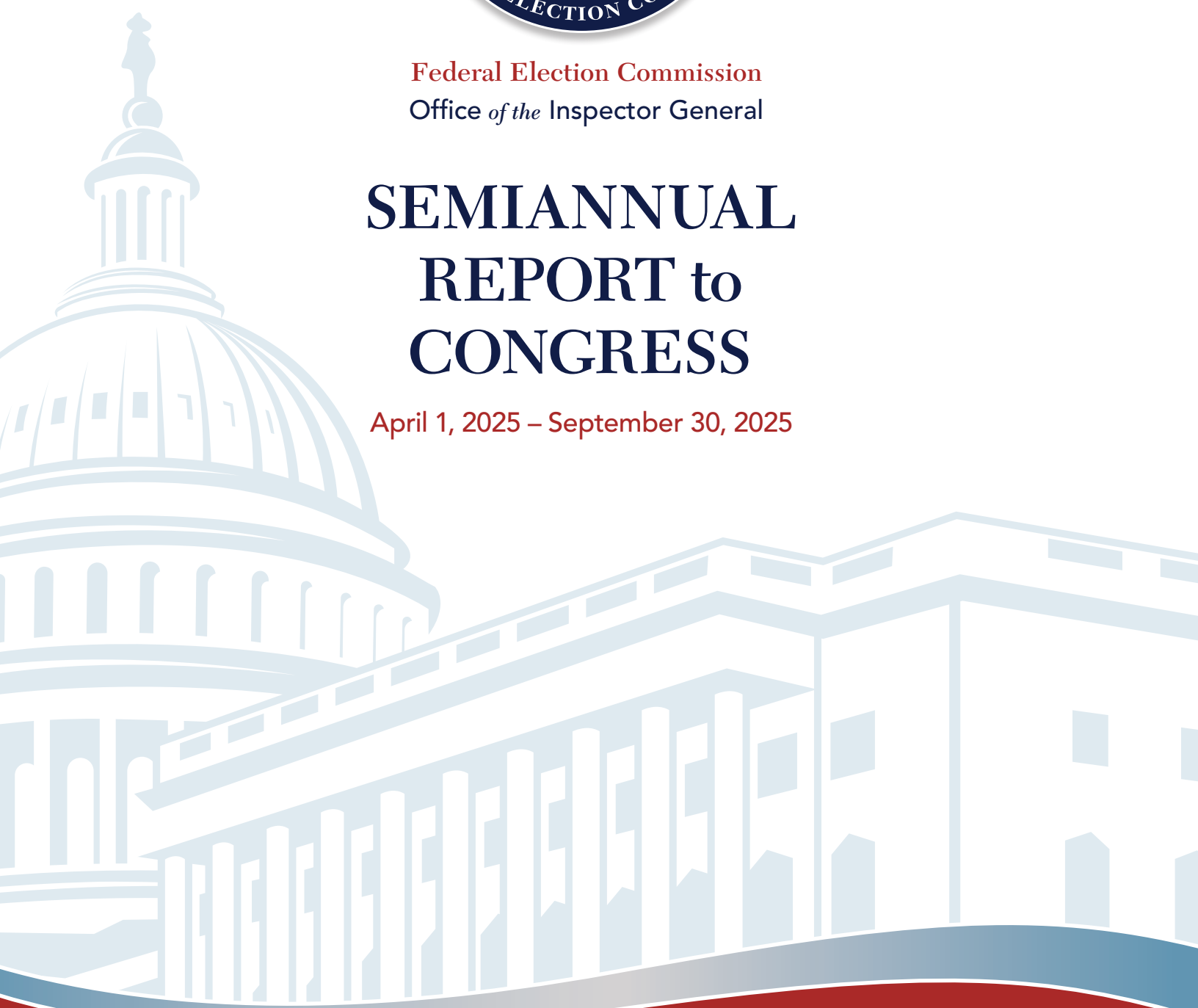




Federal Election Commission
Office *of the* Inspector General

SEMIANNUAL REPORT to CONGRESS

April 1, 2025 – September 30, 2025



NOVEMBER 2025

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

December 12, 2025

The Honorable J. Michael Johnson
Speaker of the House of Representatives
H-232 United States Capitol
Washington, D.C. 20515

The Honorable JD Vance
President of the Senate
S-212 United States Capitol
Washington, D.C. 20510

Dear Mr. Speaker and Mr. President:

Pursuant to the Inspector General Act of 1978, as amended, the Federal Election Commission submits the Office of Inspector General's *Semiannual Report to Congress*. The report summarizes the activity of the FEC Office of Inspector General ("OIG") from April 1, 2025 through September 30, 2025.

During this reporting period, the OIG completed its annual review of the FEC's compliance with improper payment requirements for Fiscal Year 2024, and it published an audit of the FEC's Security Patches and Vulnerabilities Management Programs, which was completed by independent auditors. Management's responses to the audit is included in that report, which is available on FEC.gov at: <https://www.fec.gov/office-inspector-general/>.

The Commission appreciates and shares the Office of Inspector General's commitment to sound financial and management practices and looks forward to continuing its cooperative working relationship as management takes appropriate measures to improve operations of the Commission. Copies of the *Semiannual Report to Congress* will be provided to the FEC's oversight committees.

On behalf of the Commission,

A handwritten signature in blue ink, reading "Shana M. Broussard".

Shana M. Broussard
Chair

Enclosure

Message from the Inspector General

It is my pleasure to present the Federal Election Commission (FEC) Office of the Inspector General's (OIG's) Semiannual Report to Congress for the reporting period April 1, 2025, through September 30, 2025.

This reporting period, we issued a particularly important IT security audit that examined the FEC's security patches and vulnerabilities management programs. The work was performed by an independent public accountant (IPA) who found that the FEC Office of the Chief Information Officer has established, maintained, and implemented policies and procedures for its information systems security programs that are generally effective and comply with the applicable requirements, standards, and guidelines.

While the IPA determined that the security controls in place are working as intended, the IPA concluded that these controls are not sufficient to reduce the risk of potential security breaches to an acceptable level. The IPA noted that the agency's reliance on legacy systems prevents the agency from patching known vulnerabilities in a timely manner. Additionally, the IPA observed that the FEC has had significant budget and resource constraints for several years that have contributed to its inability to remediate vulnerabilities and patches related to legacy systems and outdated equipment. The IPA also reported that, based on the agency's risk-based approach to system security, there are instances that justify the decisions not to implement all the standard government-wide system controls outlined in related Office of Management and Budget policy and guidance.

The audit report contains eight findings and ten related recommendations to improve the FEC's programs in this area. Management fully concurred with nine recommendations and partially concurred with one recommendation.

Also during this reporting period, the Farm Credit Administration concluded a peer review of the FEC OIG's investigative function. FCA OIG concluded that the FEC OIG's investigative policies and procedures were in compliance with applicable professional standards and made no recommendations for corrective action.

Lastly, this spring we also successfully deployed our new project management software. This software will ensure that all internal OIG projects meet applicable professional standards and will allow the OIG to more easily track open recommendations as well as the use of our resources. This software was the brainchild of Mr. Michael Mitchell, and it promises to significantly improve the productivity of the OIG for years to come. Thanks, Mike!

As always, I would like to thank the entire FEC OIG team for their tireless dedication to public service in general, and to the FEC and the OIG in particular. Each day they come to the office eager and determined to do their part to help the FEC succeed. I would also like to thank both Management and the Commissioners for their continued collaboration and support. The OIG could not achieve our mission without their cooperation and assistance.



Susan L. Ruge-Hudson
Inspector General

Audits, Evaluations, and Reviews

Review of the FEC’s Improper Payments Reporting R-25-01

Planning	Fieldwork	Reporting	Issued 5/5/2025
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This compliance review satisfied the OIG’s FY 2024 annual review of the FEC’s compliance with the *Payment Integrity Information Act of 2019* (PIIA). The purpose of this special review was to evaluate whether the agency has complied with the PIIA and other applicable payment integrity guidance, which includes publishing the appropriate improper payments information with the annual Performance and Accountability Report (PAR) or Annual Financial Report (AFR), along with accompanying materials for the most recent fiscal year. The OIG examined the agency’s improper payment risk assessment, payment integrity section, and other improper payment disclosure sections of the FEC’s FY 2024 AFR posted on the agency’s website. The OIG concluded that the agency complied with applicable PIIA requirements and other applicable Office of Management and Budget (OMB) guidance. No findings were reported. The OIG issued a management letter in May 2025.

This review was conducted in accordance with the requirements in the OMB Circular A-123, Appendix C (March 2021), OMB Circular A-136 (as amended), OMB Annual Data Call Instructions, OMB Payment Integrity Question and Answer Platform, and the CIGIE Guide for PIIA.

Audit of the FEC’s Security Patches and Vulnerabilities Management Programs for the Fiscal Year Ending September 30, 2024 OIG-24-02

Planning	Fieldwork	Reporting	Issued 7/7/2025
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This audit engagement was conducted by independent public accountant (IPA) Brown & Company Certified Public Accountants and Management Consultants, PLLC (Brown & Company). The main objective of the audit was to assess the operating effectiveness of the FEC’s system security patch and vulnerability management programs as of the fiscal year ending September 30, 2024.

Overall, the IPA found that the FEC Office of Chief Information Officer (OCIO) has established, maintained, and implemented policies and procedures for its information systems security programs that are generally effective and comply with the applicable OMB requirements and National Institute of Standards and Technology (NIST) standards and guidelines.

While the IPA determined that the security controls in place are working as intended, the IPA concluded that these controls are not sufficient to reduce the risk of potential security breaches to an acceptable level. The IPA noted that the agency's reliance on legacy systems prevents the agency from patching known vulnerabilities in a timely manner. Additionally, the IPA observed that the FEC has had significant budget and resource constraints for several years that have contributed to its inability to remediate vulnerabilities and patches related to legacy systems and outdated equipment. The IPA also reported that, based on the agency's risk-based approach to system security, there are instances that justify the decisions not to implement all the standard government-wide system controls outlined in related OMB information system policy and guidance.

The audit report contains eight findings and ten related recommendations to improve the FEC's Security Patches and Vulnerabilities Management Programs. Management fully concurred with nine recommendations and partially concurred with one recommendation.

Audit of the FEC's Fiscal Year 2025 Financial Statements OIG-25-01

Planning	Fieldwork	Reporting	Issued
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The FY 2025 Annual Financial Statement (FS) Audit is being conducted under a 5-year blanket purchase agreement that was awarded to IPA firm Brown & Company. During this reporting period, the entrance conference was held on April 10, 2025, which kicked off the planning phase of the audit. The start of field work and interim testing began in May 2025.

Brown & Company is currently in the process of completing end-of-year and compliance testing, and assessing information technology (IT) internal controls. As in prior years, the IPA is required by the FEC OIG's contract to conduct additional testing on IT controls, as the FEC is exempt from the *Federal Information Security Modernization Act* (FISMA) and is not required to perform an annual FISMA audit.

Normally, the IPA would have conducted end-of-year audit testing during October and early November 2025, followed by the draft report to management and exit conference by early November. However, the recent government shutdown has delayed the audit. The OIG is working closely with the IPA to complete the audit by the new deadline set by OMB.

Evaluation of the FEC's Reporting on USASpending.gov EV-25-01

Planning	Fieldwork	Reporting	Issued
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The OIG has initiated a discretionary evaluation of the FEC's compliance with the *Digital Accountability and Transparency Act of 2014* (DATA Act). The DATA Act requires Federal agencies to report standardized financial and award data in a uniform manner in order to provide insight and transparency on government spending to policymakers and the public. The primary objective of this evaluation is to determine whether the FEC's financial reporting meets

the statutory requirements of accuracy, completeness, timeliness, and quality under the DATA Act and subsequent OMB guidance. This evaluation will identify any gaps or discrepancies in the data and recommend improvements to enhance the integrity of financial reporting.

Examination of the FEC’s Circular A-123 Internal Control and Enterprise Risk Management Programs OIG-25-02

Planning	Fieldwork	Reporting	Issued
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This examination engagement commenced during this reporting period (August 12, 2025) and will be conducted by IPA Brown & Company. The overall objective is to conduct an examination of the FEC’s Circular A-123 Internal Control and Enterprise Risk Management (ERM) programs in order to express an opinion about whether the FEC’s programs are in compliance with OMB Circular A-123 and other applicable criteria, in all material respects. The examination review period is for FY 2024 and will include assessment of the annual internal control/risk assessment (ICR) assurance process as of September 30, 2024.

Pandemic Benefits Review – Small Business Administration Pandemic Assistance Programs R-25-01

Planning	Fieldwork	Reporting	Issued
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The OIG is working with the Council of the Inspectors General on Integrity and Efficiency’s (CIGIE’s) Pandemic Response Accountability Committee (PRAC) to (1) identify whether any FEC staff improperly received pandemic benefits under either the SBA Economic Injury Disaster Loan Program or the SBA Paycheck Protection Program, and (2) assess whether any FEC staff were victims of identity theft by individuals defrauding these programs. Several studies have shown that identity theft was a significant problem in the pandemic relief programs; accordingly, the OIG views this second objective as particularly important.

Pandemic Benefits Review – U.S. Department of Labor Unemployment Insurance Program R-25-02

Planning	Fieldwork	Reporting	Issued
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The OIG is working with the U.S. Department of Labor OIG to (1) identify whether any FEC staff improperly received unemployment insurance during the pandemic, and (2) assess whether any FEC staff were the victims of identity theft by individuals defrauding the program. Several studies have shown that identity theft was a significant problem in the pandemic relief programs; accordingly, the OIG views this second objective as particularly important.

Review of the Impact a Loss of Quorum Has on FEC Operations R-26-01

Planning	Fieldwork	Reporting	Issued
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The OIG will examine the impact that a loss of quorum has on FEC operations. Specifically, the OIG will note what work is affected by the loss of quorum and what work continues as usual. To the extent that data is available, the OIG will seek to examine how prior losses of quorum impacted FEC operations, particularly the losses of quorum that occurred in September 2019-June 2020 and July 2020-December 2020. The OIG will report on any “best practices” or “lessons learned” that are identified.

Investigative Activity

The OIG has broad discretion to carry out investigations related to FEC programs and operations that the Inspector General determines are necessary or appropriate. There is a broad range of matters that fall within the OIG's investigative purview, including violations of laws, regulations, or rules; mismanagement; abuses of authority; and more. Investigative activities may be initiated upon allegations or referrals received from a variety of sources, including, but not limited to, FEC employees or contractors, Congressional committees, other agencies, or members of the public. The OIG may also investigate potential fraud, waste, abuse, or mismanagement identified through OIG audits, evaluations, or reviews.

In exercising its investigative authorities, the OIG works to develop products that are timely, clear, and credible, and to guard the identity of those who provide information to the OIG or are the subject of complaints. All investigations are carried out in accordance with the CIGIE *Quality Standards for Investigations*.

Investigative Activities (April 1, 2025 – September 30, 2025)	
Complaints received	42
Complaints closed (additional information in next table)	46
Other contacts with the public ¹	28
Investigations initiated	0
Investigations closed	0
Investigative reports issued ²	0
Open investigations as of September 30, 2025	0
Persons referred to the U.S. Department of Justice for criminal prosecution	0
Persons referred to state or local prosecuting authorities for criminal prosecution	0
Indictments and criminal informations that resulted from any prior referral to prosecuting authorities	0

¹ These are communications that do not rise to the level of complaints because they are not FEC-specific, fail to state a complaint, or are resolved during the call.

² This figure includes all reports of investigation and management advisories issued to the Commissioners and does not include the closing memoranda for any preliminary inquiries.

Complaint Activity

The OIG hotline provides a means for FEC employees, FEC contractors, and the public to communicate directly and confidentially with the OIG regarding allegations of fraud, waste, abuse, and mismanagement. Additionally, the OIG may open a complaint based upon information received from Congress, FEC management, or the results of an audit, evaluation, or review.

The OIG takes all matters referred to our office seriously. Accordingly, we carefully analyze all information received to determine the appropriate course of action, which could include, but is not limited to, the following:

- **Opening a full investigation:** These are complaints where there is sufficient evidence to indicate that a question of fact exists regarding whether or not there has been a violation of law, regulation, or policy.
- **Referring to FEC management or an existing FEC program or process:** These are situations where the issue presented is more appropriately handled by FEC management, such as matters that require Commission action, or where there is already an existing process for resolution of the matter, such as Equal Employment Opportunity complaints.
- **Referring to an external agency:** These complaints are outside of the jurisdiction of the OIG and so we refer them to the federal, state, or local agency that does have jurisdiction.
- **Referring internally to the OIG audit, evaluation, and review function:** Some complaints raise issues that are more appropriately explored through the OIG's audit, evaluation, and review function. Such complaints are referred to the OIG's auditors and program analysts for evaluation.
- **Assisting complainant:** In these complaints, the OIG has determined that the issue is best handled by an existing process or another entity, and the OIG informs the complainant about the options they may pursue.
- **Closing with no further action:** These are complaints that are frivolous, have already been addressed, provide insufficient detail for the OIG to take action, or otherwise warrant no further action by the OIG.

Resolution of Closed Complaints April 1, 2025 – September 30, 2025	
Opened an investigation	0
Referred to FEC management or an existing FEC program/process	3
Referred to external agency	2
Referred internally to OIG audit/evaluation/review function	0
Assisted complainant	17
Closed with no action	23
Total	45

Trafficking Victims Prevention and Protection Reauthorization Act of 2022

The *Trafficking Victims Prevention and Protection Reauthorization Act of 2022* requires the OIG to report annually on suspected violations relating to trafficking in persons; investigations resulting from those suspected violations; the status and outcomes of those investigations; and related recommendations to improve Agency programs and operations. The OIG has no responsive information for Fiscal Year 2025.

Recommendation Follow-up Activity

As required by the *Inspector General Act of 1978*, as amended, the OIG is responsible for, among other things, conducting audits, evaluations, and reviews of the FEC's programs and operations and making recommendations for improvement. The OIG follows up on all recommendations that have been outstanding for more than six months and identifies the progress management has made in addressing such recommendations to date. Accordingly, the figures detailed herein do not include recommendations less than six months old.

Recommendations Open for Over Six Months as of September 30, 2025	
Reports	Recommendations Still Open
Review of Commission Directive 06, Handling of Internally Generated Matters (link , issued October 11, 2022)	# 1
Review of the FEC Travel and Purchase Card Program (SR-23-02 , issued August 1, 2023)	# 5
Total Open Recommendations	2

Recommendations Closed April 1, 2025 to September 30, 2025	
Reports	Recommendations Closed
Inspection of the FEC's Disaster Recovery Plan and Continuity of Operations Plan (OIG-12-06 , issued Jan. 30, 2013)	# 11, # 12
Audit of the FEC's Human Capital Management Program for FY 2022 (OIG-22-02 , issued August 1, 2023)	# 2
Total Recommendations Closed	3

Appendix I. Audit and Evaluation Reports Issued During the Reporting Period

Appendix I lists all audit and evaluation reports issued during the reporting period. For each report, the table lists the dollar value of questioned costs (including the dollar value of unsupported costs), the dollar value of any recommendations that funds be put to better use, and whether a management decision had been made by the end of the reporting period.

Report	Dollar Value of Questioned Costs		Dollar Value of Recommendations that Funds be Put to Better Use	Management Decision Made by End of Reporting Period
	Total	Unsupported		
Audit of FEC's Security Patches & Vulnerabilities Management Programs for FY 2024	\$0	\$0	\$0	N/A

Appendix II. Recommendations for Corrective Action over Six Months Old as of September 30, 2025

Appendix II identifies recommendations made before the reporting period for which corrective action has not been completed as of September 30, 2025, including potential cost savings.

Report Title	Report Number	Date Issued	Total # of Recs.	# Open Recs.	Cost Savings
OIG Review of Commission Directive 06	2023-10-001	10/5/2022	1	1	\$0
Review of the FEC Travel and Purchase Card Programs	SR-23-02	8/01/2023	5	1	\$0
Totals			6	2	\$0

Appendix III: Peer Review Results

To ensure adherence to relevant professional standards, each OIG is subject to periodic external peer reviews. The *Inspector General Act of 1978* requires OIGs to report to Congress the results of any peer reviews it received or conducted during the reporting period.

Audit

Generally accepted government auditing standards require an organization conducting audits in accordance with those standards to undergo an external peer review at least once every three years.

The FEC OIG's audit function was not subject to a peer review during the reporting period. However, the FEC OIG will be subject to a peer review during the next reporting period as the current three-year peer review period ends September 30, 2025.

The most recent audit peer review that the FEC OIG received was conducted by the United States International Trade Commission (USITC) OIG on March 10, 2023. The USITC OIG concluded that the FEC OIG's audit policies and procedures were current and consistent with applicable professional auditing standards and made no recommendations for corrective action.

Investigation

CIGIE's *Qualitative Assessment Review Guidelines for Investigative Operations of Federal Offices of Inspector General* establish an independent external evaluation process for investigative operations. The objective of an investigative peer review is to determine whether internal control systems are in place and operating effectively to provide reasonable assurance that an OIG's investigative operations comply with CIGIE's *Quality Standards for Investigations*. While the guidelines do not mandate that OIGs without statutory law enforcement authority, like the FEC OIG, undergo investigative peer reviews, CIGIE encourages voluntary participation.

On July 14, 2025, the Farm Credit Administration (FCA) OIG issued a peer review of the FEC OIG's investigative function. FCA OIG concluded that the FEC OIG's investigative policies and procedures were in compliance with applicable professional standards and made no recommendations for corrective action.

Evaluation

The CIGIE *Quality Standards for Inspection and Evaluation* require members of CIGIE that conduct inspections or evaluations under those standards to undergo an external peer review every three years. The FEC OIG's evaluation function is new and will undergo its first peer review during the next peer review cycle, which will span FY 2027-2029.

Appendix IV: Statutory Reporting Mandates for the OIG

Law	Requirement
Inspector General Act of 1978 (5 U.S.C. § 401, et seq.)	§ 404(d) – IG must report expeditiously to the Attorney General whenever the IG has reasonable grounds to believe there has been a violation of Federal criminal law § 405(b) – IG must submit specified information to Congress in Semiannual Reports § 405(e) – IG must report immediately to the head of the agency when the IG becomes aware of particularly serious or flagrant problems, abuses, or deficiencies related to agency programs and operations; the agency head must transmit this letter to Congress within seven calendar days § 406(b)(3) – IG must report to Congress if a request for information or assistance has been unreasonably refused or not provided by an agency head
31 U.S.C. § 3521	IG must audit or oversee an independent audit of the agency's financial statements
Reports Consolidation Act of 2000 (Pub. L. 106-531)	IG must summarize what the IG considers to be the most serious management and performance challenges facing the agency and briefly assess the agency's progress in addressing those challenges, to be included in the agency's Annual Financial Report
Payment Integrity Information Act of 2019 (Pub. L. 116-117)	IG must review agency compliance with improper payment reporting mandates
Government Charge Card Abuse Prevention Act of 2012 (Pub. L. 112-194)	(1) IG must conduct periodic risk assessments of government purchase cards; (2) if agency's purchase card spending exceeds \$10 million, IG must submit a report on purchase card violations semiannually; and (3) if agency's travel card spending exceeds \$10 million, IG must conduct periodic audits or reviews of travel card programs
GPRA Modernization Act of 2010 (5 U.S.C. § 306)	IG must develop a strategic plan for the OIG

Law	Requirement
Trafficking Victims Prevention and Protection Reauthorization Act of 2022 (Pub. L. 117-348)	IG must annually report on suspected violations related to trafficking in persons, investigations resulting from those suspected violations, the status and outcomes of those investigations, and related recommendations to improve agency programs and operations
42 U.S.C. § 2000ee-2	IG must periodically conduct a review of the agency's implementation of its privacy and data protection policies

Index of IG Act Semiannual Reporting Requirements

IG Act	Description	Section/ Page
5 U.S.C. § 405(b)(1)	Significant problems, abuses, and deficiencies	None
5 U.S.C. § 405(b)(2)	Recommendations made before the reporting period for which corrective action has not been completed	Appendix II
5 U.S.C. § 405(b)(3)	Summary of significant investigations closed during the reporting period	N/A
5 U.S.C. § 405(b)(4)	Convictions during the reporting period resulting from OIG investigations	None
5 U.S.C. § 405(b)(5)	Information regarding each audit, inspection, or evaluation report issued during the reporting period	Appendix I
5 U.S.C. § 405(b)(6)	Management decisions made with respect to any audit, inspection, or evaluation issued during the reporting period	N/A
5 U.S.C. § 405(b)(7)	Information described under section 804(b) of the <i>Federal Financial Management Improvement Act of 1996</i>	None
5 U.S.C. § 405(b)(8)	Results of peer reviews completed during the reporting period or the last date of a peer review	Appendix III
5 U.S.C. § 405(b)(9)	Outstanding recommendations from peer reviews	None
5 U.S.C. § 405(b)(10)	Peer reviews conducted of another OIG during the reporting period	None
5 U.S.C. § 405(b)(11)	Statistical table for investigative activities	Investigative Activity
5 U.S.C. § 405(b)(12)	Description of the metrics used for developing investigative statistics	Investigative Activity
5 U.S.C. § 405(b)(13)	Investigations of senior government employees where allegations of misconduct were substantiated	None

IG Act	Description	Section/ Page
5 U.S.C. § 405(b)(14)	Description of any whistleblower retaliation	None
5 U.S.C. § 405(b)(15)	Description of attempts to interfere with IG independence	None
5 U.S.C. § 405(b)(16)	Closed audits, evaluations, or investigations involving senior government employees not disclosed to the public	None



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!