

FYs 2025–2026 Annual Plan

December 2024



U.S. Department of Education Office of Inspector General

Office of Inspector General Sandra D. Bruce Inspector General

December 2024

This report is in the public domain. Authorization to reproduce it in whole or in part is granted. While permission to reprint this publication is not necessary, the citation should be: U.S. Department of Education, Office of Inspector General, FYs 2025–2026 Annual Plan.

PLEASE NOTE:

The Office of Inspector General's FY 2025 Annual Plan is available <u>here</u> on the OIG website.

All images used under license from Shutterstock.com and Adobe Stock.

Message from the Inspector General

I am pleased to provide the U.S. Department of Education (Department) Office of Inspector General (OIG) annual plan for fiscal years (FY) 2025–2026. Our annual plan identifies the audits, inspections, and other activities that the OIG intends to undertake to assist the Department in fulfilling its responsibilities to America's citizens and students.

Our FYs 2025–2026 Annual Plan details the assignment areas we plan to devote to evaluations of the efficiency, effectiveness, and integrity of Department programs and operations. It aligns the OIG's work and resources to achieve our mission, meets the goals of our <u>5-year Strategic Plan</u>, and focuses attention across the <u>management challenges</u> facing the Department. As such, our planned and ongoing work involves Department programs and operations at all levels—Federal, State, and local. In the development of our annual plan, we request the input of key stakeholders, including Department leadership, the Office of Management and Budget, and the U.S. Congress.

Throughout FYs 2025–2026, the OIG will continue its oversight efforts involving grantees' administration and oversight of pandemic relief aid. The Department received more than \$280 billion in supplemental pandemic funding to assist States, schools, school districts, and institutions of higher education in meeting their needs and the needs of their students impacted by the pandemic. We have already completed a significant amount of the oversight work presented in our <u>Pandemic Relief Oversight Plan</u>; however, there remains more to do to ensure that these funds were used as intended and that recipients complied with applicable laws. To that end, we will continue to dedicate resources to pandemic aid oversight, most notably additional efforts related to the administration and use of Elementary and Secondary School Emergency Relief grant funds by U.S. territories, State educational agencies, and local educational agencies. Examples of the work we plan to do involving pandemic relief aid can be found on page 4 of this report, and copies of our completed work are available <u>here</u> on our website.

In FYs 2025–2026, the OIG will also continue to focus efforts on issues related to the student financial assistance programs. These programs have long been a major focus of our audit and investigative work. They are inherently risky because of their complexity, the amount of funds involved, the number of program participants, and the characteristics of student populations. OIG efforts in this area seek not only to protect Federal student aid funds from fraud, waste, and abuse, but also to protect the interests of the next generation of our nation's leaders—America's students—and improve the efficiency and effectiveness of student financial assistance programs and operations. Work we look to conduct in this area includes issues related to the Federal Student Aid office's (FSA) implementation of the Partner Connect System, FSA's administration of the Public Service Loan Forgiveness Buyback program, FSA's transition of student loan servicing to its Unified Servicing and Data Solution, FSA's monitoring of contractor performance and invoicing, and postsecondary schools' compliance with selected Title IV program requirements. You will find more details on these and other planned efforts on page 6 of this report.

The OIG will also maintain a focus on critical elementary, secondary, postsecondary, and vocational education grant programs, as well as the Department's internal operations. In addition, we will continue

to help identify emerging risks and vulnerabilities throughout the Department and will dedicate resources to ensuring that critical Federal education funds are being used for the purposes intended. Page 9 of this report will provide additional information on the work we look to do in these areas.

The OIG plans to also continue to devote resources to limited scope reviews in high-interest areas that provide faster completion times when compared to traditional audits. Planning this work is a collaborative and recurring process that involves frequent input from multiple OIG components, including Audit Services, Investigation Services, Technology Services, and Legal Services. This dynamic activity identifies value-added, quick response work that furthers our ability to promote the efficiency, effectiveness, and integrity of the Department's programs and operations.

Although our FYs 2025–2026 Annual Plan provides a framework for the activities that we intend to accomplish, we retain the flexibility to divert resources to other priorities as they arise. Often, the OIG receives tasks from external sources, such as new legislative mandates, Congressional hearings and inquiries, Department requests, or governmentwide reviews that result in unplanned activities. Whether we are examining an issue from our annual plan or a new, unplanned assignment, we will meet our overarching goals and turn our resources into results.

We look forward to continuing to work with the Department and the Congress in meeting our goals and fulfilling our mission.

Sandra D. Bruce Inspector General



Contents

U.S. Department of Education Office of Inspector General FYs 2025–2026 Annual Plan	1
Mission Statement	1
Introduction	1
Strategic Plan Goals	1
FY 2025 Management Challenges	2
FYs 2025–2026 Work Plan Priority Areas and Activities	3
Specialized Work: Pandemic Relief	4
Student Financial Assistance Programs and Operations	6
Elementary, Secondary, Postsecondary, and Vocational Education Grant Programs and	
Operations	9
Department Management and Operations	13
Work Required by Statute	16
FYs 2025–2026 Annual Plan and FY 2025 Management Challenges	19
Acronyms and Abbreviations	

U.S. Department of Education Office of Inspector General FYs 2025–2026 Annual Plan

Mission Statement

To promote the efficiency, effectiveness, and integrity of the Department's programs and operations through our independent and objective audits, investigations, inspections, and other activities.

Introduction

The U.S. Department of Education (Department) Office of Inspector General's (OIG) <u>Strategic Plan</u> sets forth our mission, vision, and goals. Our mission is rooted in our statutory responsibilities under the Inspector General Act of 1978, as restated (5 U.S.C. §§ 401–424), (IG Act). The IG Act established OIGs as independent and objective organizations within the Federal departments and agencies and authorizes each OIG to do the following:

- Conduct and supervise audits and investigations relating to its agency's programs and operations.
- Provide leadership, coordinate, and recommend policies for activities designed to promote economy, effectiveness, and efficiency in the agency's programs and operations; and to prevent and detect waste, fraud, and abuse in the agency's programs and operations.
- Keep its agency head and Congress fully and currently informed of problems and deficiencies in the agency's programs and operations and on the status of corrective actions.

Strategic Plan Goals

The OIG's Strategic Plan for FYs 2023–2028 provides the roadmap by which we plan to accomplish our mission. To meet our mission, we have established the following goals.

- **Goal 1: Maximize Our Value to Stakeholders.** Promote effectiveness in the Department's programs and operations by delivering relevant and timely information to our stakeholders.
- **Goal 2: Combat Program Fraud and Cyber Threats.** Conduct timely, high-quality investigations and digital analyses to detect and deter fraud, waste, abuse, and other criminal activity involving Department programs and operations.
- **Goal 3: Invest in the OIG Workforce and Workplace.** Cultivate a talented and diverse workforce and an inclusive, equitable, and accessible workplace that inspires engagement, creativity, and excellence.
- **Goal 4: Innovate and Collaborate.** Implement innovative and collaborative internal processes that leverage technology, foster strategic thinking, and advance organizational effectiveness.

The first goal focuses on our responsibilities under the IG Act to promote economy, efficiency, and effectiveness and to prevent and detect waste, fraud, and abuse. The second goal focuses on the use of investigations and digital analyses to detect and deter criminal activity negatively impacting Federal funds. The third and fourth goals focus on the people, culture, and internal functions of the OIG, providing the foundation for our capacity to achieve the first two goals now and in the future. The OIG's Strategic Plan provides more details on the specific strategies developed for each goal and associated performance measures.

FY 2025 Management Challenges

For FY 2025, the OIG identified the following areas as significant management challenges for the Department:

- oversight and monitoring of student financial assistance programs,
- oversight and monitoring of grantees,
- data quality and reporting, and
- information technology security.

FYs 2025–2026 Work Plan Priority Areas and Activities

The activities presented in the FYs 2025–2026 Annual Plan are conducted under the OIG's first Strategic Plan goal. These activities were developed in consideration of factors including an assessment of risk to the Department's programs and operations, the OIG's mission and goals, stakeholder feedback, FY 2025 management challenges, and resource availability. We present these activities in four priority areas: (1) specialized work specific to pandemic relief; (2) student financial assistance programs and operations; (3) elementary, secondary, postsecondary, and vocational education grant programs and operations; and (4) Department management and operations. At the end of the annual plan, we include a table that correlates the FYs 2025–2026 Annual Plan projects to the FY 2025 Management Challenges.



Specialized Work: Pandemic Relief

Three measures were signed into law providing the Department with more than \$280 billion to assist States, school districts, elementary and secondary schools, and postsecondary institutions in meeting their needs and the needs of their students impacted by the coronavirus pandemic—the Coronavirus Aid, Relief, and Economic Security Act or CARES Act (March 2020); the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (December 2020); and the American Rescue Plan or ARP (March 2021). The CARES Act also allowed the Department to provide State educational agencies (SEA) and local educational agencies (LEA) with waivers of certain statutory or regulatory requirements and included provisions intended to provide Federal student loan borrowers with emergency relief.

In response, the OIG plans to continue performing a series of audits and quick response work relating to pandemic relief programs and requirements. This includes reviews of grantees' management and use of pandemic relief funds. Our investigations focus on serious allegations of misuse, theft, and other criminal activity involving pandemic relief aid. Examples of our issued reports and investigations can be found on our <u>website</u>.

New Specialized Work: Pandemic Related

Elementary and Secondary School Emergency Relief (ESSER) Fund

LEAs' Implementation of ARP ESSER Afterschool Activities and Summer Learning Programs— Determine whether selected LEAs implemented afterschool activities and summer learning programs that aligned with their approved ARP ESSER plans.

U.S. Territory's Use of ARP ESSER Funds to Administer Tests Measuring Students' Academic Progress—Determine whether the selected U.S. territory ensured that services contracted for and paid with ARP ESSER funds to measure students' academic progress were provided and consistent with the purposes of the ARP ESSER program.

U.S. Territories' Use of American Rescue Plan-Outlying Areas State Educational Agencies (ARP-OA SEA) Funds—Determine whether selected U.S. territories used ARP-OA SEA funds for allowable purposes in accordance with applicable requirements.

Continuing Specialized Work: Pandemic Related

ESSER Fund

LEAs' Use of ESSER Grant Funds—Determine whether selected LEAs expended ESSER grant funds for allowable purposes in accordance with applicable requirements. We are continuing work in Nevada at Douglas County School District, Lincoln County School District, Nye County School District, and Clark County School District. Previous reports issued to selected LEAs in Alaska and Iowa can be found on our <u>website</u>.

Emergency Assistance to Nonpublic Schools (EANS)

SEAs' Administration of EANS Grant Funds—Determine whether selected SEAs designed and implemented (1) application processes that adequately assessed nonpublic schools' eligibility for EANS-funded services or assistance and complied with other applicable requirements and (2) oversight processes to ensure that EANS-funded services or assistance were used for allowable purposes. We are continuing work at the Wisconsin Department of Public Instruction. We issued reports to the Florida Department of Education (A23GA0135) and Tennessee Department of Education (A23NY0148).



Student Financial Assistance Programs and Operations

The Department delivers more than \$120 billion in Federal student aid annually to more than 9.9 million postsecondary students and their families, and it manages an outstanding student loan portfolio valued at more than \$1.6 trillion, making it one of the largest financial institutions in the country. As such, effective oversight and monitoring of its programs, operations, and program participants is critical to improve the efficiency and effectiveness of these programs and operations and to ensure that the funds are not subject to fraud, waste, and abuse. Our planned and continuing work in the student financial assistance programs includes Department oversight of schools, other program participants, and implementation of its programs and initiatives. We will also continue to devote significant resources towards investigating allegations of fraud in student financial assistance programs. Results of these investigations are published on our <u>website</u>. New priority work and continuing work within this area for FYs 2025–2026 include the following.

New Priority Work: Student Financial Assistance Programs and Operations

Student Loan Servicing Vendor Transition

FSA's Implementation of Unified Servicing and Data Solution (USDS)—Determine whether FSA has adequate plans for transitioning student loan servicing to its USDS vendors and identify the status of the USDS vendors' transition.

Loan Forgiveness

Public Service Loan Forgiveness Buyback Program—Evaluate FSA's administration of the Public Service Loan Forgiveness Buyback program.

Partner Connect System

FSA's Implementation of the Partner Connect System—Determine the extent to which FSA encountered issues in the development and deployment of the Partner Connect System, took steps to correct any issues, and communicated the status of the system's functionality to external partners.

Postsecondary School Annual Audits

FSA's Processes for Monitoring Schools' Implementation of Corrective Actions in Response to Their Noncompliance—Determine whether FSA designed and implemented procedures to ensure that (a) it correctly categorizes findings identified in postsecondary schools' annual audits and (b) schools take corrective actions when appropriate.

90/10 Revenue Percentages

Impact of Statutory and Regulatory Changes on Proprietary Schools' 90/10 Revenue Percentages—Determine whether the legislative and regulatory changes in the types of revenue included in the 90/10 calculation have affected proprietary schools' revenue percentages.

Proprietary Schools' Compliance with 90/10 Revenue Percentage Calculation Requirements— Determine whether selected for-profit postsecondary schools' 90/10 revenue percentages were calculated in accordance with the Federal requirements.

Workforce Planning

FSA's Workforce Planning—Determine the extent to which FSA has designed and implemented workforce planning processes that align with the organization's mission, strategic goals, and strategic objectives.

Contractor Performance and Invoicing

FSA's Monitoring of Contractor Performance and Invoicing—Determine whether FSA's oversight of selected contracts resulted in goods and services being provided in accordance with contract terms, and that payments were supported by sufficient documentation.

Title IV Program Requirements

Postsecondary Schools' Compliance with Selected Title IV Program Requirements—Determine whether selected postsecondary schools complied with certainTitle IV of the Higher Education Act of 1965, as amended program requirements.

Continuing Work: Student Financial Assistance Programs and Operations

Oversight of Proprietary Schools

FSA's Oversight of Contractor's Acceptability Review Process for Proprietary School Annual Audits—Determine whether FSA's oversight of its contractor's acceptability review process ensures that annual proprietary school audits meet applicable audit reporting requirements.

Foreign Gift and Contract Reporting Requirements

FSA's Oversight of Section 117 Reporting Requirements—Determine the extent to which FSA provides oversight of institutions' of higher education reporting of foreign gifts and contracts under Section 117 of the Higher Education Act, as amended.

Liabilities from Closed Colleges

Department's Assessment and Recoupment of Liabilities from Closed Colleges—Determine the results of the Department's processes for assessing and recouping liabilities from colleges that closed.

Quality of Cost of Attendance and Graduation Rate Data

Quality of Cost of Attendance and Graduation Rate Data Reported to the Department's Integrated Postsecondary Education Data System (IPEDS)—Determine whether the selected postsecondary school reported verifiable data to the Department's IPEDS. We are continuing our work at NUC University, Joliet Junior College, University of Texas Permian Basin, Spring Hill College, and Southern New Hampshire University.

FAFSA Simplification Act and Loan Forgiveness Initiatives

FAFSA Simplification Act and Student Loan Forgiveness Initiatives Accounting—Determine if (1) for the FAFSA Simplification Act and student loan forgiveness initiatives, FSA has prepared accountings of appropriated funds, obligations, administrative expenses, and staffing for FYs 2021 through 2024; and (2) FSA provided Congress with detailed spend plans of anticipated uses of funds made available under the FY 2021 through 2024 appropriations laws.

FAFSA Forms

FSA's Plan for Processing 2025-2026 Free Application for Federal Student Aid (FAFSA) Forms— Review FSA's plans to solicit and incorporate feedback from students, families, institutions of higher education, and other stakeholders for the completion, submission, and processing of the 2025–2026 FAFSA form.

Emerging Areas of Heightened Risk

Audits, Inspections, and Investigations of Selected Program Participants—Throughout the year, we may receive referrals from program offices requesting review of postsecondary institutions or other student financial assistance program participants where the possibility of fraud, waste, or abuse of Federal funds has been identified. We also receive Hotline allegations or other information alleging fraud or misuse of Federal funds or may otherwise identify specific institutions that warrant review. Objectives will vary based on the nature of the concerns. Generally, objectives will relate to whether the institutions are complying with regulations, program guidelines, and the Higher Education Act, as amended, or will help alert the Department to any emerging and systemic areas of abuse.



Elementary, Secondary, Postsecondary, and Vocational Education Grant Programs and Operations

The Department's early learning, elementary, and secondary education programs annually serve more than 17,000 school districts and more than 55 million students attending more than 98,000 public schools and 30,000 private schools. In addition, FSA oversaw the disbursement of approximately \$29.7 billion in grants to approximately 6 million recipients. The Department is responsible for ensuring that these grant programs are executed in compliance with applicable requirements and that grantees meet program objectives. Our audits in this area include reviews of the Department's and grantees' internal controls and oversight processes to ensure that Federal funds are appropriately used and reach intended recipients, reported data are accurate and complete, and progress is made towards achieving programmatic goals. Our investigations focus on serious allegations of fraud and corruption involving these programs, examples of which can be found on our <u>website</u>. New priority work and continuing work within this area for FYs 2025–2026 include the following.

New Priority Work: Elementary, Secondary, Postsecondary, and Vocational Education Grant Programs and Operations

Digital Wallet-Related Technologies and Services

SEAs' and LEAs' Use of Digital Wallet-Related Technologies and Services—Determine the extent to which SEAs and LEAs use digital wallet-related technologies and services to administer Federal education funds.

SEAs' Oversight of Digital Wallet-Related Technologies and Services—Determine whether selected SEAs have sufficient processes for ensuring compliance with applicable requirements related to their (1) use of Federal education funds for digital wallet-related technologies and services and (2) oversight of LEAs' use of such funds for similar purposes.

Individuals with Disabilities Education Act

LEAs' Internal Controls Over Individualized Education Programs (IEP)—Determine whether selected LEAs designed and implemented sufficient processes for overseeing the development of IEPs for children with disabilities and ensuring that those children receive the services described in their IEPs.

Elementary and Secondary Education Act of 1965

Department's Oversight of the Supporting Effective Instruction State Grants Program— Determine whether the Department had sufficient processes for overseeing SEAs' effective use of Supporting Effective Instruction State Grants program funds in meeting program goals and objectives.

Department's Oversight of the English Language Acquisition State Grants Program—Determine whether the Department had sufficient oversight processes to ensure that SEAs use English Language Acquisition State Grants program funds for allowable purposes in compliance with applicable requirements.

SEAs' Oversight of the Student Support and Academic Enrichment Program—Determine whether selected SEAs had adequate oversight processes to ensure that LEAs administered Student Support and Academic Enrichment program grants in accordance with Federal and program requirements.

Department's Oversight of Magnet Schools Assistance Program Grants—Determine whether the Department had sufficient oversight processes to ensure that Magnet Schools Assistance program grantees are meeting the performance goals and objectives established in their approved grant applications.

Department's Evaluation of Full-Service Community Schools Program Grantees Performance— Determine whether the Department had sufficient oversight processes to ensure that Full-Service Community Schools program grantees met applicable performance objectives and outcomes before awarding continuation awards to those grantees.

LEAs' Use of School-Based Mental Health Services Grant Program Funds—Determine whether selected LEAs used School-Based Mental Health Services Grant program funds for allowable purposes in accordance with applicable requirements.

Carl D. Perkins Career and Technical Education Act of 2006

U.S. Territory's Use of Career and Technical Education Program Funds—Determine whether the Puerto Rico Department of Education acquired goods and services using Career and Technical Education program funds in compliance with Federal cost principles and in accordance with the program's goals.

Higher Education Act of 1965

Office of Postsecondary Education's (OPE) Assessment of Risk and Monitoring of Programs Administered by its Higher Education Programs—Determine whether OPE has (1) completed any risk assessments of the programs administered by its Higher Education Programs and (2) designed and implemented a monitoring plan to allocate its resources to target the areas deemed to pose the highest risk.

Emerging Areas of Heightened Risk

Audits, Inspections, and Investigations of Select Grantees—Periodically, program offices will request that we review grantees where the possibility of fraud, waste, or abuse of Federal funds has been identified. We also receive Hotline allegations or other information alleging fraud or misuse of Federal funds, or otherwise identify specific grantees that warrant review. Objectives will vary based on the nature of the referral or reasons for conducting the audit work. Generally, the objectives will relate to whether grantees are complying with applicable laws, regulations, and grant terms.

Continuing Work: Elementary, Secondary, Postsecondary, and Vocational Education Grant Programs and Operations

Elementary and Secondary Education Act of 1965

Department's Monitoring of the School-Based Mental Health Services Program—Determine whether the Department implemented processes to provide reasonable assurance that it (1) awarded School-Based Mental Health Program grants only to SEAs and LEAs with a demonstrated need and (2) monitored grantee performance towards meeting the goals in their approved applications.

Department's Design and Implementation of the Stronger Connections Program—Determine whether the Department designed and implemented a sufficient process for reviewing SEAs' 90-day Stronger Connections program reports and timely communicated deficiencies or concerns to grantees and provide information on key data reported by SEAs regarding their administration of the grants.

SEAs' Oversight of Spending and Educational Outcomes of Prevention and Intervention Program for Children and Youth Who Are Neglected, Delinquent, or At Risk—Determine whether selected SEAs' oversight activities are providing reasonable assurance that State agencies and LEAs are (1) making sufficient progress toward achieving the intended goals of the Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At Risk and (2) taking action when progress is not being made. We are continuing our work at the New York State Education Department.

SEAs' Implementation of Statewide Accountability Systems—Determine whether selected States implemented selected components of their statewide accountability systems in accordance with their approved Every Student Succeeds Act State plans and any approved amendments. We are

continuing our work at the Connecticut Department of Education and West Virginia Department of Education. We issued reports to the Mississippi Department of Education (<u>A22IL0091</u>) and Oregon Department of Education (<u>A23IL0142</u>).



Department Management and Operations

The Department needs effective systems of internal control, well-managed business processes, and sufficient monitoring and financial management systems to help achieve its organizational goals. We routinely plan and conduct audits and other reviews focused on ensuring the efficiency, effectiveness, and integrity of the Department's management and operations. We also assess risks, evaluate indicators, and perform tests that are designed to detect fraud, waste, and abuse. Our investigations, audit, computer analysis, and computer forensics staff work together to help identify weaknesses in internal controls that could leave the Department's programs or operations vulnerable to fraud, waste, and abuse. This interdisciplinary work can result in criminal and civil investigations of fraud in the Department's programs and operations. New priority work, ongoing work, and other related activities for FYs 2025–2026 include the following.

New Priority Work: Department Management and Operations

Office for Civil Rights (OCR)

Office for Civil Rights Complaint Processing—Assess OCR's complaint resolution process to identify any potential vulnerabilities that could impact its ability to fulfill its enforcement responsibilities effectively.

Institute of Education Sciences (IES)

IES' Oversight of Regional Educational Laboratory Contracts—Determine whether IES is adequately overseeing Regional Educational Laboratory contracts to ensure compliance with performance and reporting requirements under the Education Sciences Reform Act of 2002.

Audit Follow Up

Department's Follow Up Process for Internal Audits—Evaluate controls to ensure that agreedupon corrective actions have been taken in response to OIG-issued internal audit reports and alternative products.

Contracts

Department's Maintenance of Contract Files—Determine the adequacy of the Department's policies for maintaining contract files and whether those policies are being followed.

Telework Program and Locality Pay Adjustments

Department's Telework Program and Locality Pay Adjustments—Determine whether the Department is adjusting locality pay for affected employees in accordance with applicable requirements.

Space Management

Department's Space Management—Assess the Department's efforts in reducing costs and optimizing utilization of office space.

Continuing Work: Department Management and Operations

Reasonable Accommodations

Department's Administration of Reasonable Accommodations—Determine how the Department is administering its reasonable accommodation program and implementing related requirements.

Whistleblower Protection

Department Non-Disclosure Policies, Forms, and Agreements—Determine whether the Department includes the anti-gag provision statement, as required by the Whistleblower Protection Enhancement Act of 2012, in nondisclosure policies, forms, and agreements.

Emerging Areas of Heightened Risk

Audits, Inspections, or Investigations of Department Operations and Programs, and Responses to Congressional Inquiries or Requests—Throughout the year, we may receive requests from various sources, including Congress, to review specified Department operations, programs, or officials where the possibility of fraud, waste, or abuse of Federal funds has been identified or suspected. We may receive additional requests from these sources to review the efficiency, effectiveness, and integrity of the Department's management and operations. We also receive Hotline allegations or other information alleging fraud or misuse of Federal funds or may otherwise identify specific Department operations, programs, or officials that warrant review. Objectives will vary based on the nature of the concerns.

Related OIG Activities

Data Analytics

Continue to support investigations and audits by further developing proactive, intuitive, and interactive data analytic and risk model systems to identify adverse trends and possible fraud, waste, and abuse in Department programs or operations. For example, we established data analytic processes to detect electronic fraud activities such as student aid fraud rings and identity theft within the Federal student aid arena. We developed a visualization tool that helps assess the overall risk for purchase card activity. We also worked with other OIG offices and established data matching agreements and processes to identify specific types of potential fraudulent or abusive behaviors.

Fraud Awareness Presentations

Continue to conduct awareness presentations to entities and people who award, disburse, or receive Federal education dollars, including Department employees, contractors, grant recipients, and school officials. These presentations highlight common fraud schemes and indicators, serving to educate people on specific vulnerabilities within the programs, contracts, and grants they oversee; and enhance the OIG's ability to generate referrals, as well as the Department's overall ability to prevent and detect fraud.

Investigative Support Services

Operate the OIG Hotline, which provides a means for anyone to report suspected fraud, waste, or abuse involving Department funds or programs. We evaluate complaints received through the OIG website, telephone, fax, or U.S. mail and refer them for OIG investigation, audit, or other review, or to other offices or agencies as appropriate.

Technology Crimes Investigations and Investigative Technical Support

Continue protecting the Department's programs and network infrastructure by investigating technology-based criminal activity that impairs or obstructs the integrity and efficiency of the Department's Information Technology infrastructure or data. We will continue evaluating and initiating investigations into the unauthorized access of any information technology system used in the administration, processing, disbursement, or management of Federal funds originating from the Department. We will also continue to conduct forensic analysis of digital evidence in support of OIG criminal investigations.



Work Required by Statute

Department Management and Operations

Attestations, Risk Assessments, and Required Follow-up Reviews

Drug Control Attestation—To express a conclusion about the reliability of Department management's assertions related to the National Drug Control Program activities, as stated in the current Office of National Drug Control Policy Circular.

Financial Statements

Department-Wide Financial Statement Audit—Oversee and monitor the independent public accounting firm contracted to provide an opinion on whether the Department-wide financial statements were fairly presented in all material respects in accordance with accounting principles generally accepted in the United States. The independent public accounting firm will also report material weaknesses and significant deficiencies in the Department's internal control over financial reporting and whether the Department complied with applicable provisions of Federal laws, regulations, contracts, and grant agreements that could have a material effect on the basic financial statements.

FSA Financial Statement Audit—Oversee and monitor the independent public accounting firm contracted to provide an opinion on whether FSA's financial statements were fairly presented in all material respects in accordance with accounting principles generally accepted in the United States. The independent public accounting firm will also report material weaknesses and significant deficiencies in FSA's internal control over financial reporting and whether FSA complied with applicable provisions of Federal laws, regulations, contracts, and grant agreements that could have a direct and material effect on the basic financial statements.

Improper Payments

Annual Compliance Review of the Department's Compliance with Improper Payment Reporting Requirements—Determine whether the Department complied with the Payment Integrity Information Act of 2019.

Information Technology Security

Federal Information Security Modernization Act of 2014 Audit—Assess the Department's progress at improving the maturity of its information technology security program and practices as required by the Federal Information Security Modernization Act of 2014.

Non-Federal Audits

Non-Federal Audit Activities—Under the IG Act; the Single Audit Act; the Higher Education Act, as amended, and implementing regulations; Uniform Guidance; and cognizant agency responsibility guidelines, the OIG is responsible for ensuring the quality and usefulness of the non-Federal audit process. The OIG must also ensure that non-Federal audits meet requirements and are reliable and effective tools to improve the integrity and effectiveness of Department programs. To meet those responsibilities, the OIG performs desk reviews and quality control reviews to assess the quality of non-Federal audits, provides technical assistance to non-Federal auditors, develops or assists in developing audit guidance, participates in certain post-audit activities, and represents the Department at interagency meetings involving the non-Federal audit process.

Whistleblower Activities

Mandatory Contractor Whistleblower Reprisal Investigations—The OIG is required by statute to receive and investigate certain allegations of reprisal provided by contractor, subcontractor, grantee, and subgrantee employees. These investigations must be completed within 360 days at most. The OIG must provide its results to the Secretary of Education for a determination of whether a reprisal occurred and an appropriate remedy.

Legislation and Regulations

The IG Act also states that the OIG is responsible for reviewing existing and proposed legislation and regulations related to the programs and operations of the Department. The OIG accomplishes this in several ways, as follows.

- Review and comment on draft legislation, regulations, and proposed Department policies, procedures, and guidance; observe negotiated rulemaking sessions; and participate in an advisory capacity on Departmental policy groups.
- Review and comment on pending legislation or regulations of other agencies that affect the Department, its recipients, or entities participating in Department programs.
- Provide recommendations to Congress for consideration during the reauthorization process for Department programs.

• Review and provide comments to the Office of Management and Budget on proposed guidance.

Other Activities

The OIG performs several other activities related to its obligation to keep Congress informed about any problems or deficiencies with the Department's administration of its programs and operations, including participation in cross-agency groups, as follows.

Congressional Requests

The OIG responds to congressional requests for information or analysis.

Council of the Inspectors General on Integrity and Efficiency (CIGIE)

The OIG staff play an active role in CIGIE efforts, leading or participating on more than a dozen committees, subcommittees, and workgroups. Inspector General Sandra D. Bruce chairs the CIGIE Employee Engagement and Innovation Committee and is a member of CIGIE's Audit Committee and the Information Technology Committee. OIG staff also lead or facilitate CIGIE work groups and training courses. More information on these activities can be found in our <u>Semiannual Reports to Congress</u>.

Pandemic Response Accountability Committee (PRAC)

The OIG is a statutorily required member of the PRAC, and OIG staff are actively involved in a number of subcommittees, workgroups, and task forces. Inspector General Sandra D. Bruce chairs the PRAC's Federal, State, and Local Coordination Subcommittee and is a member of its Financial Oversight Work Group. OIG staff also participate with the PRAC Identity Theft and Redress group and are working with PRAC partners on cross-cutting projects. More information on the OIG's activities with the PRAC can be found on our <u>pandemic relief oversight webpage</u> and in our <u>Semiannual Reports to Congress</u>.

FYs 2025–2026 Annual Plan and FY 2025 Management Challenges

Below you will find both planned and ongoing projects presented in the FYs 2025–2026 Annual Plan under the FY 2025 Management Challenges.

Projects that are planned as quick response work are identified with a caret (^). Ongoing work is indicated with an asterisk (*).

FY 2025 Management Challenge	Related FYs 2025–2026 Annual Plan Projects
Oversight and Monitoring of Student Financial Assistance Programs	 FSA's Oversight of Contractor's Acceptability Review Process for Proprietary School Annual Audits* FSA's Oversight of Section 117 Foreign Gift and Contract Reporting Requirements*^ Department's Assessment and Recoupment of Liabilities from Closed Colleges*^ FAFSA Simplification Act and Student Loan Forgiveness Initiatives Accounting*^ FSA's Plan for Processing 2025-2026 FAFSA Forms*^ FSA's Implementation of Unified Servicing and Data Solution Public Service Loan Forgiveness Buyback Program^ FSA's Implementation of the Partner Connect System FSA's Processes for Monitoring Schools' Implementation of Corrective Actions in Response to Their Noncompliance^ Impact of Statutory and Regulatory Changes on Proprietary Schools' 90/10 Revenue Percentages^ Proprietary Schools' Compliance with 90/10 Revenue Percentage Calculation Requirements^ FSA's Monitoring of Contractor Performance and Invoicing^ Postsecondary Schools' Compliance with Selected Title IV Program Requirements^

FY 2025 Management Challenge	Related FYs 2025–2026 Annual Plan Projects
Oversight and Monitoring of Grantees	 SEAs' Implementation of Statewide Accountability Systems Connecticut Department of Education* West Virginia Department of Education* SEAs' Oversight of Spending and Educational Outcomes of Prevention and Intervention Program for Children and Youth Who Are Neglected, Delinquent, or At Risk New York State Education Department* Department's Monitoring of the School-Based Mental Health Services Program* Department's Design and Implementation of the Stronger Connections Program*A SEAs' and LEAs' Use of Digital Wallet-Related Technologies and Services*A SEAs' Oversight of Digital Wallet-Related Technologies and Services*A EAs' Internal Controls Over IEPs^ Department's Oversight of the Supporting Effective Instruction State Grants Program Department's Oversight of Magnet Schools Assistance Program GrantsA Department's Evaluation of Full-Service Community Schools Program Grantees PerformanceA LEAs' Use of School-Based Mental Health Services Grant Program FundsA SEAs' Oversight of the Support and Academic Enrichment Program Puerto Rico Department of Education's Use of Career and Technical Education Program FundsA OPE's Assessment of Risk and Monitoring of Programs Administered by its Higher Education Programs^ Quality Control Reviews of Single and Compliance Audits
Data Quality and Reporting	 SEAs' Implementation of Statewide Accountability Systems Connecticut Department of Education* West Virginia Department of Educationa* SEAs' Oversight of Spending and Educational Outcomes of Prevention and Intervention Program for Children and Youth Who Are Neglected, Delinquent, or At Risk New York State Education Department* SEAs' Administration of EANS Grant Funds Wisconsin Department of Public Instruction* FSA's Oversight of Section 117 Foreign Gift and Contract Reporting Requirements* Department's Design and Implementation of the Stronger Connections Program*^ Quality of Cost of Attendance and Graduation Rate Data Reported to the Department's IPEDS NUC University*^ Joliet Junior College*^ Spring Hill College*^ Southern New Hampshire University *^ Department-Wide Financial Statement Audit

FY 2025 Management Challenge	Related FYs 2025–2026 Annual Plan Projects
Information Technology Security	Federal Information Security Modernization Act of 2014 Audit

Acronyms and Abbreviations

Abbreviation	Full Name
ARP	American Rescue Plan
ARP-OA SEA	American Rescue Plan-Outlying Areas State Educational Agencies
CARES Act	Coronavirus Aid, Relief, and Economic Security Act
CIGIE	Council of the Inspectors General on Integrity and Efficiency
Department	Department of Education
EANS	Emergency Assistance to Nonpublic Schools
ESSER	Elementary and Secondary School Emergency Relief
FSA	Federal Student Aid
FAFSA	Free Application for Federal Student Aid
FY	fiscal year
IEP	Individualized Education Program
IES	Institute of Education Sciences
IG Act	Inspector General Act of 1978, as restated (5 U.S.C. §§ 401–424)
IPEDS	Integrated Postsecondary Education Data System
SEA	State educational agency
LEA	local educational agency
OCR	Office for Civil Rights
OIG	Office of Inspector General
OPE	Office of Postsecondary Education
PRAC	Pandemic Response Accountability Committee
USDS	Unified Servicing and Data Solution