

Federal Election Commission
Office *of the* Inspector General

FY 2022 Work Plan

October 1, 2021

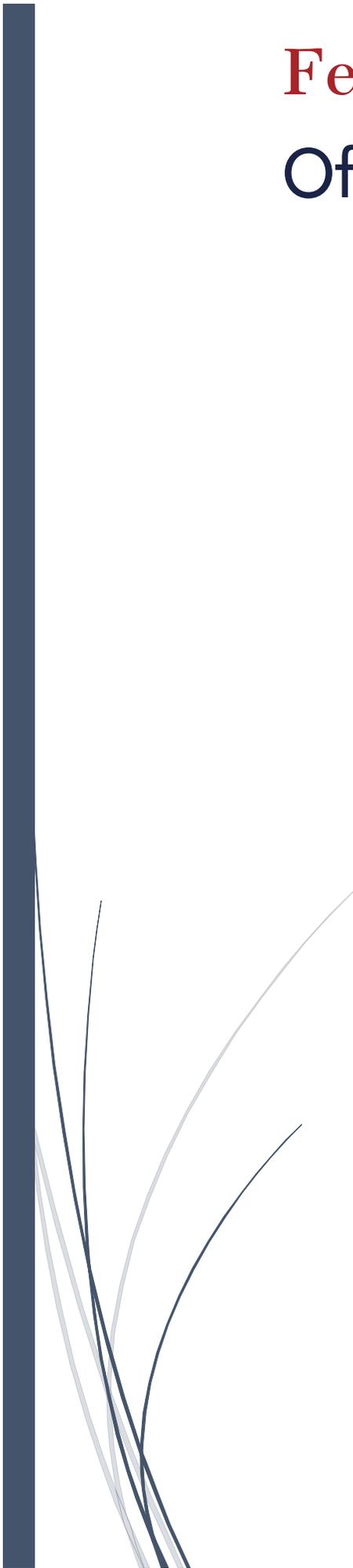


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Message from the Inspector General

It is with great pleasure that I present the Federal Election Commission (FEC) Office of Inspector General's (OIG) Fiscal Year (FY) 2022 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 2022. 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 and investigative programs accomplished much of the work planned in FY 2021, which included, among other things, developing the FY21-FY25 FEC OIG Strategic Plan, conducting value added audits and reviews, responding to hotline complaints, and investigating allegations of wrongdoing. In FY 2022, the OIG plans to conduct two audits (via contractual agreement) and one special review of FEC operations as well as respond to hotline complaints and investigate allegations of wrongdoing.

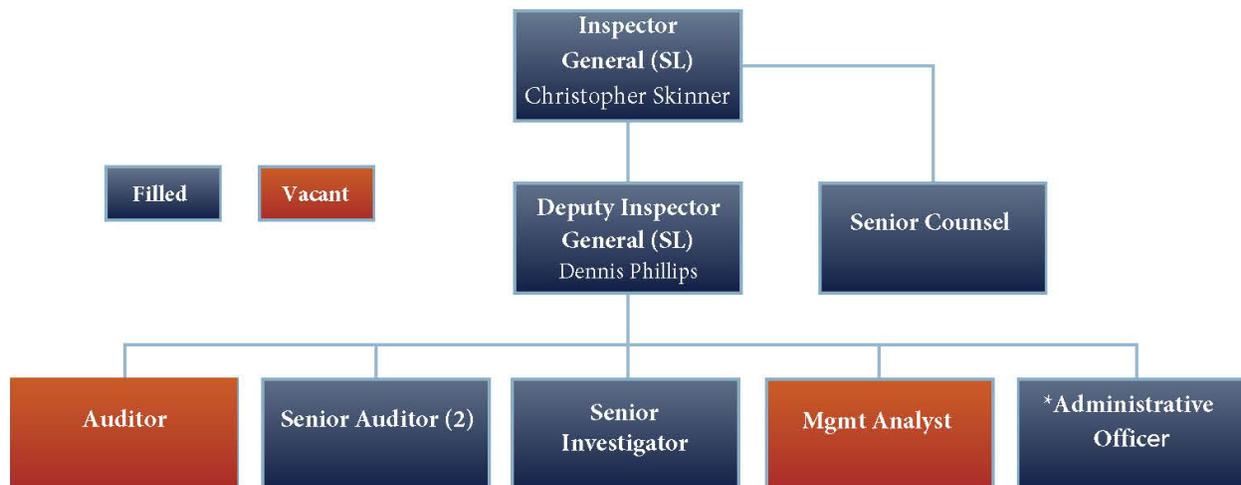
Going forward, the FEC OIG remains committed to conducting audits and special reviews to strengthen the agency's internal controls, addressing hotline complaints, resolving outstanding audit recommendations, and ensuring that the FEC and OIG programs evince a high level of integrity, which is fundamental 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



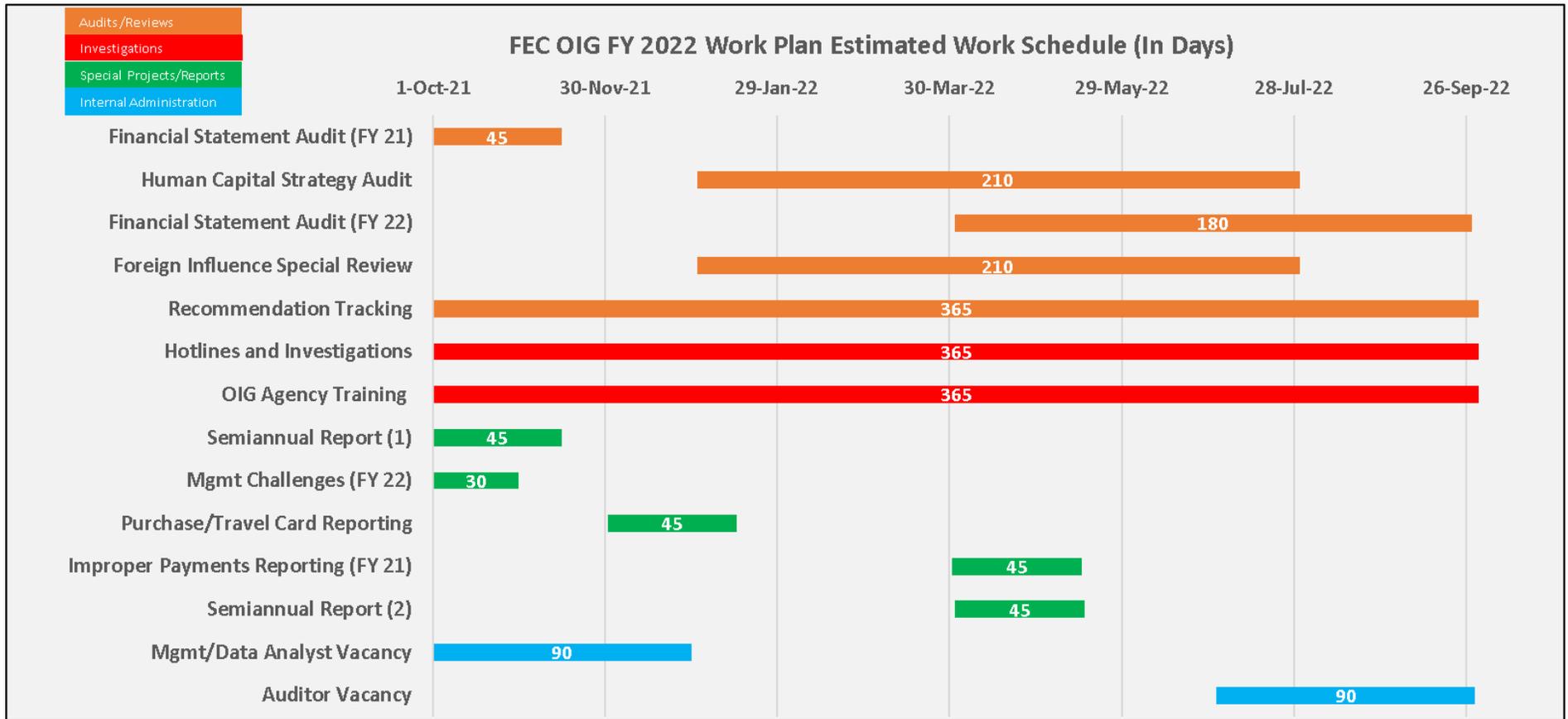
FEC Office of the Inspector General Organization Chart



* 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: September 2021

OIG FY 2022 Work Plan Estimated Work 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 2022 OIG work plan is divided into four broad categories:

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

Audits 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. 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 website (<https://www.fec.gov/oig/>).

OIG investigations analyze complaints 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.

Special projects and reports may include, but are not limited to, projects the agency head has requested the OIG look into, mandated reporting requirements (*i.e.*, semiannual reports, improper payments reporting, purchase and travel card 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***: These remain a top priority to fill FY 2022. The OIG plans to fill the vacant positions (pending budget requirements) in FY 2022 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 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 with plans to hire an additional auditor in late FY 2021 or FY 2022 pending budget approval.

Additionally, 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, the objective of a special review is to provide management a value-added report that identifies systemic deficiencies and opportunities for improvement. Special reviews are conducted in accordance with the quality standards issued by the federal IG community and the authority of the IG Act.

The OIG plans to conduct the following audits and special reviews in FY 2022:

1. Audit of the Federal Election Commission’s FY 2021 and FY 2022 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 2021 and 2022 financial statement audits. An independent accounting firm, Brown & Company, is conducting the FY 2021 Financial Statement Audit and is in the third year of its contract.¹ 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 Human Capital Strategy, Policy, and Operations

The objective of this audit will include evaluation of the FEC’s human capital programs and activities in support of mission goals to identify and implement improvements. This audit may also look at workforce planning; human capital strategy; organizational design and position classification; diversity and inclusion; employee engagement and communications; and organizational development (OPM/Federal Human Capital Business Reference Model). It may also include assessing how the management of human capital during the Covid pandemic impacted the workforce, the Commission’s strategic goals, and agency objectives.

¹ Due to the coronavirus (COVID-19) pandemic, all audits are being conducted remotely.
FY 2022 OIG Work Plan

3. Special Review of Potential Foreign Influence in the 2020 Election Cycle

The mission of the FEC is to provide oversight of campaign fundraising and spending, both of which have increased dramatically in recent years. The objective of the special review will be to evaluate the extent to which that increase in campaign activity and existing FEC policies and practices have affected the risk of unlawful foreign donations in U.S. elections during the 2020 election cycle.

4. 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 (21 total as of September 30, 2021).

Audit follow up in FY 2022 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 functions for the following time periods of performance in FY 2022:

- **Financial Statement Audit FY 2021:**² October 2021 – November 2021 (45 + days)
- **Human Capital Strategy Audit:** January 2022 – July 2022 (210 days)
- **Financial Statement Audit FY 2022:** April 2022 – September 2022 (180 + days)
- **Foreign Influence Special Review:** January 2022 – July 2022 (210 days)
- **Recommendation Tracking:** October 2021 – September 2022 (365 days)

² The timelines associated are limited to the FY 2022 schedule. For instance, the FY 2021 Financial Statement Audit was initiated in April 2021 and will require 180 days to complete.

Investigations

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 newly implemented 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 (i.e., 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. Additionally, the OIG will provide an in-person/virtual training event for each FEC division in FY 2022. We continue to update and revise the public web page to better educate the public on our mission objectives.

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

- **Hotlines and Investigations:** October 2021 – September 2022 (365 days)
- **OIG Agency Training:** October 2021 – September 2022 (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 2022:

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. As required by the IG Act, semiannual reports are provided to the Commission.

2. Management Challenges for FY 2022

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. Purchase and Travel Card Reporting

In accordance with the Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act) and OMB Circular A-123, *A Risk management Framework for Government Charge Card Programs*, the OIG has discretion to conduct purchase card assessments as they feel necessary.

By way of background, pertinent sections of the Charge Card Act require that OIG's:

- Report purchase card program violations to OMB on a semiannual basis if the agency spends more than \$10 million via the purchase card
- Conduct periodic assessments of purchase card or convenience check programs, report findings to the agency head, and report to OMB the implementation of those reported findings

In addition, OMB Circular A-123 requires that OIG's periodically assess purchase card programs if their respective agencies exceed \$10 million in annual purchases and/or \$10 million in travel card spending.

4. Improper Payments Reporting for FY 2021

The OIG is required to conduct an annual review of FEC's compliance with the Payment Integrity Information Act of 2019 (PIIA). The PIIA requires each agency to periodically review all programs and activities that it administers, identify those susceptible to significant improper payments, estimate the amount of improper payments for those programs that are deemed susceptible to significant improper payments, and publish the accompanying information with the annual financial statement. The OIG is required to annually assess agency compliance with the PIIA and the Office of Management and Budget's (OMB) M-18-20, as amended, and to report the results to Congress, the Comptroller General, and to OMB.

- **Semiannual Report to Congress (1):** October 2021 – November 2021 (45 days)
- **Management Challenges for FY 2022:** October 2021 (30 days)
- **Purchase and Travel Card Reporting:** December 2021 – January 2022 (45 days)
- **Improper Payments Reporting FY 2021:** March 2022 – April 2022 (45 days)
- **Semiannual Report to Congress (2):** April 2022 – May 2022 (45 days)

Internal Administration

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

In addition to the OIG's audit 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 2022:

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; FAEC DATA Act 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 2022 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 two (2) vacant positions:

- Management Program Analyst
- Auditor

The OIG anticipates expending its resources to fill the approved vacant position for the following time periods of performance:

- **Management Program Analyst:** October 2021 – December 2021 (90 days)
- **Auditor:** July 2022 – September 2022 (90 days)

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 2021. 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 – Shana M. Broussard (Chair), Allen Dickerson (Vice Chair), Sean J. Cooksey, James E. “Trey” Trainor III, Steven T. Walther, 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.

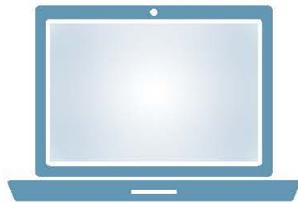
Appendix D: Hotline Poster



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!