

Compendium of Office of Inspector General Reports Related to Diversity, Equity, Inclusion, and Accessibility

The Office of Inspector General (OIG) community recognizes that in its responsibility for conducting and supervising audits, investigations, and reviews to detect and prevent waste, fraud, and abuse and promote economy, efficiency, and effectiveness in the administration of the establishment's programs and operations, there is an inherent connection to external stakeholders and their diversity, equity, inclusion, and accessibility (DEIA) efforts.

External stakeholders of OIGs are individuals or groups, whether inter-, intra- or non-governmental, who do not work inside the OIG but are affected in some way by the decisions and actions of the OIG. Some examples, among others, of OIG external stakeholders are U.S. citizens and taxpayers, recipients of government programs or funding, Congress, the OIG's host agency or department, and other Federal, State, and local agencies. Some stakeholders may share interests, such as operational efficiency and being good stewards of government funds, while others may have diverging interests.

The purpose of the compendium is three-fold: First, readers can increase their awareness of DEIA projects across the IG community. Second, we believe the document can be used to discuss, learn about, and generate project ideas for OIGs. Finally, the work group believes this is only a start—future OIG projects uploaded to oversight.gov will have DEIA tags that will allow more comprehensive and up-to-date research going forward.

The information contained in this compendium is organized thematically with a summary of the results and a hyperlink to the respective report. The themes assigned to each report are aligned to executive orders and internally and externally focus group areas established by the DEIA Work Group:

- Accessibility and Equity in Government Programs
- Compliance with Executive Order 13950, "Combatting Race and Sex Stereotyping," September 22, 2020
- Business Supplier Diversity
- Performance, Recognition, and Awards
- Promotions and Professional Development
- Recruitment, Hiring, and Staffing
- Stakeholders and Partners
- Training and Awareness

The table below provides a collection of DEIA-related work completed by the OIG Community between FY 2014 and FY 2021. This collection of work provides a nonexhaustive list of projects with specific DEIA-review objectives or a DEIA component included within a larger review objective. OIG acronyms are listed at the end of the compendium.

OIG	Title	Summary	Themes
DOJ	Audit of the Federal Bureau of Prisons' Management and Oversight of its Chaplaincy Services Program (Report Number: 21-091; July 2021)	The DOJ OIG found that "Chaplaincy Shortages and Diversity Challenges Present Risks" and explained that "the absence of a fully-staffed and diverse chaplaincy, the Federal Bureau of Prison's institutions are unable to adequately staff their religious services programs, prompting many institutions to turn to alternatives such as inmate-led services and heavy reliance on contract faith providers and minimally vetted volunteer faith providers to fill the gaps in the chaplaincy staff. These staffing shortages and alternatives present risks."	Recruitment, Hiring, and Staffing
DOJ	Management Advisory Memorandum: Notification of Concerns Identified in the Department of Justice's Human Resources Policies (Report Number: 21-100; August 2021)	<p>The review reported concerns in the department's human resources policies and as noted in the 2020 Top Management and Performance Challenges report, the Department faces the challenge of continuously filling vacant and new positions with top-notch employees who can effectively fulfill the DOJ mission. The Department also recognized that human capital was a mission-support risk in its FY 2020 Enterprise Risk Management Risk Profile. The DOJ OIG believes dated, incomplete, and disorganized Department-wide human resources policies, such as those identified in this memorandum, exacerbate this challenge and have the potential to negatively impact the ability of DOJ components to recruit, hire, and retain a high-performing and diverse workforce. The report recommended the following:</p> <ul style="list-style-type: none"> • Conduct a review to identify all areas where DOJ policies do not reflect current regulations and OPM guidance and requirements and establish a plan of action that includes a timeline for addressing the identified deficiencies and gaps in Department policy. • Ensure that it regularly monitors and updates the Department's human resources policies, to include (a) converting interim policy to permanent policy within 1 year, as applicable; and (b) deconflicting policies that contradict or supersede other policies. • Evaluate its processes for reviewing and updating the Department's human resources policies every 5 years to determine if more frequent periodic reviews may be necessary. • Prioritize its efforts to consolidate the Department's human resources policies in a centralized location accessible to components and incorporate the relevant policies into DOJ Order 1200.1, as appropriate. 	Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
DOL	OFCCP Did Not Show It Adequately Enforced EEO Requirements on Federal Construction Contracts (Report Number: 04-20-001-14-001; March 2020)	<p>The Office of Federal Contract Compliance Programs (OFCCP) did not adequately enforce Equal Employment Opportunity requirements on federal construction contracts. The DOL OIG based this conclusion on the results below:</p> <p>OFCCP did not use a risk-based approach to select construction contractors for Equal Employment Opportunity compliance evaluations. Federal guidance and OFCCP’s strategy for selecting contractors requires the agency to focus resources on those who posed the greatest risk of noncompliance. Instead, OFCCP chose contractors without using a risk assessment.</p> <p>OFCCP said its outdated computer system prevented it from selecting contractors using a risk-based approach. However, the DOL OIG identified data in OFCCP’s computer system and processes that could have been used to measure contractor risk. OFCCP’s stated enforcement focus was to find and resolve systemic discrimination. However, DOL OIG determined OFCCP’s selection process identified systemic discrimination in 1 percent of the contractors evaluated. By applying a risk-based approach focused on contractors with the greatest risk of noncompliance, OFCCP might have identified more systemic discrimination.</p>	Recruitment, Hiring, and Staffing
State	Inspection of the Bureau of Political-Military Affairs (Report ISP-I-15-27; June 2015)	State OIG made 24 recommendations to the Bureau of Political-Military Affairs to enhance the Foreign Policy Advisor Program, implement procedures for property accountability, strengthen grants management, validate staffing needs, address records management deficiencies, broaden Equal Employment Opportunity and diversity awareness, and bolster security practices and procedures.	Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
FCA	Human Capital Planning at the Farm Credit Administration (Report No. A-15-03; February 2016)	<p>The objective of the audit was to assess the adequacy of the Agency’s human capital planning and the effectiveness of its implementation. The audit focused on the following three areas: key person dependency and succession planning; employee turnover and recruiting; and workplace diversity and inclusion.</p> <p>The FCA OIG found the Agency had an adequate human capital planning process. FCA has a Human Capital Plan for FY 2014–2018 in place and a new plan was being prepared. Regarding succession planning, FCA has a process to identify key person dependencies and plans for future needs of the Agency. There is also a training program for personnel who are responsible for recruiting examiner and intern positions for the Office of Examination, the most prominent career path within FCA. Finally, with respect to diversity and inclusion, FCA has an equal employment opportunity and inclusion program. The Equal Employment Opportunity and Inclusion Director reports directly to the FCA Board Chairman, and there are written policies and procedures. All employees are accountable for supporting equal employment opportunity and inclusion, in part, by being evaluated on it in their performance evaluations.</p> <p>The FCA OIG identified a few opportunities, however, to improve or modify human capital planning and implementation. Several key positions in the Agency were not identified in the human capital planning request. Efforts to address the gap in mid-career experience levels and track progress in doing so could increase effectiveness. Developmental and training programs could be enhanced. The Agency’s workforce diversity and inclusion efforts could be improved through outreach efforts, increased coordination, and data collection and analysis efforts.</p> <p>The Agency agreed to eleven specific tasks to strengthen FCA’s human capital planning and implementation.</p>	Recruitment, Hiring, and Staffing
FDIC	The FDIC’s Efforts To Provide Equal Opportunity and Achieve Senior Management Diversity (Report No. Eval-15-001; November 2014)	<p>In March 2014, the Ranking Member and Minority members of the U.S. House of Representatives Committee on Financial Services requested that the FDIC OIG perform work related to the FDIC’s efforts to increase senior management diversity. The members referenced a 2013 Government Accountability Office report that concluded, among other things, that management-level representation of minorities and women among the Federal financial agencies had not changed substantially from 2007 through 2011 despite senior management diversity provisions in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The members requested that the FDIC OIG determine whether agency internal operations and personnel practices were systematically disadvantaging minorities and women from obtaining senior management positions.</p>	Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
FHFA	Women and Minorities in FHFA's Workforce (EVL- 2015-003; January 2015)	<p>On March 24, 2014, nine members of the U.S. House of Representatives asked the Inspectors General at seven financial regulators, including the FHFA, to conduct a review of diversity and related workplace issues at their agencies. The FHFA OIG found the following.</p> <p>Human Resource Data Limitations: Deficiencies in FHFA's human resources data systems limited the FHFA OIG's ability to perform certain analyses of diversity and workforce issues. Where FHFA's human resources data systems provided sufficient data, the FHFA OIG analyzed that data and reached conclusions.</p> <p>Representation of Minorities and Women in the Workforce: According to FHFA data, the percentage of minorities and women in senior positions at FHFA increased from 2011 to 2013. Promotions of minorities at the senior level increased from 2011 to 2013. At mid-level positions during this timeframe, FHFA data showed that the percentage of women increased and that the percentage of minorities remained generally unchanged.</p>	Recruitment, Hiring, and Staffing
FHFA	Compliance Review of FHFA's Office of Minority and Women Inclusion Compliance (COM-2019-005; June 2019)	<p>In March 2014, nine members of the U.S. House of Representatives asked the Inspectors General at seven financial regulators, including FHFA, to conduct a review of diversity and related workplace issues at their agencies. In response, FHFA OIG initiated an evaluation to: (1) determine if any personnel practices had systematically prevented minorities and women from obtaining senior management positions at the Agency; (2) determine if any personnel practices had created a discriminatory workplace for minorities and women; and (3) assess the Office of Minority and Women Inclusion's operations.</p> <p>In the report published in January 2015, the FHFA OIG found that the Office of Minority and Women Inclusion carried out statutorily mandated reporting requirements, conducted diversity training, and initiated a number of other efforts to increase diversity. The FHFA OIG also found, however, that FHFA had not acted on some of the Office of Minority and Women Inclusion's proposals concerning diversity and workforce issues. For example, FHFA had not acted on the office's draft diversity and inclusion strategic plan. FHFA agreed to the recommendation that it adopt, and by implication implement, a diversity and inclusion strategic plan. The Office of Minority and Women Inclusion's published its FY16–18 Strategic Plan in July 2015. The FHFA OIG closed the recommendation in January 2016 based on the publication of the Strategic Plan.</p>	Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
CFPB	The Board Can Take Additional Steps to Advance Workforce Planning (Board Report: 2019-MO-B-004; March 25, 2019)	<p>Workforce planning helps address gaps between today's workforce and tomorrow's human capital needs. In light of the Board's level of retirement-eligible workers and its need for a workforce with specialized skills, the CFPB OIG evaluated the Board's workforce planning efforts.</p> <p>The Board identified workforce planning as a strategic priority and has further developed its workforce planning capability through a pilot program. But without buy-in across divisions, the Board may struggle to advance its workforce planning strategy enterprise-wide.</p>	Recruitment, Hiring, and Staffing
PBGC	Incentives and Compensation Flexibilities Program To Recruit and Retain a Qualified Workforce Was Administered Inconsistently (Report No. AUD-2014- 10/PA-12-86; September 2014)	The PBGC did not consistently apply incentives and compensation flexibilities (flexibilities) related to recruitment and retention in compliance with the Code of Federal Regulations and OPM policies. This occurred because the programs did not have effective governance or adequate controls, including effective policies and procedures. As a result, student loan benefits and incentives were awarded with varying levels of documentation and support, which resulted in mandatory criteria not being applied and justifications not being consistently and completely documented.	Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
Smithsonian	Human Resource Management: Smithsonian Needs to Strengthen Its Procedures for Hiring Trust Employees When Not Using the Federal Process (OIG-A- 21-01; October 2020)	<p>Based on Smithsonian OIG analysis, all 437 Trust positions were properly exempted from the federal advertising process in accordance with Smithsonian policy (such as for temporary appointments of 1 year or less). Although the positions were exempted from the federal advertising process, unit staff told Smithsonian OIG that they used other means to advertise 47 of the 85 sampled positions but had documentation for advertising only 32. For these 32 unit-advertised Trust positions, Smithsonian OIG found that the Office of Human Resources did not comply with SD 213 requirements that it receive all applications, evaluate the qualifications of the applicants, and provide the units with a selection list of the better-qualified applicants. Rather, since at least 2009, the Office of Human Resources has been allowing the units to receive and evaluate all applications and to submit the applications only of the selected individuals to the office. The Office of Human Resources has limited its role to determining whether the unit-selected applicant met the minimum qualifications for the position. In addition, the Office of Human Resources has not monitored how the units receive, evaluate, and select candidates.</p> <p>Smithsonian OIG also found that the Smithsonian is not in compliance with Equal Employment Opportunity Commission’s requirements to gather data on race, national origin, sex, and disability status of these applicants and to track their progress through the Trust hiring process. As a result, the Smithsonian has no information to ensure that a fair and consistent process was followed to fill Trust positions.</p>	Recruitment, Hiring, and Staffing
TVA	Talent Acquisition and Diversity’s Organizational Effectiveness (Evaluation 2016-15445-03; August 2017)	The TVA OIG identified strengths within Talent Acquisition and Diversity related to (1) organizational alignment, (2) collaboration, (3) support from TAD management, and (4) department morale and ethics. However, TVA OIG also identified potential risks that could negatively affect the achievement of the mission. These risks include (1) the potential for increased noncompliance risk due to (a) the use of social media in the recruitment process and (b) no documentation requirements for hiring interns, (2) talent acquisition process inefficiencies, and (3) the potential for ineffective inclusion metrics and programs.	Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
TVA	Organizational Effectiveness Follow-up—Human Resources (Final Report—Evaluation 2018-15582; September 2018)	<p>The TVA OIG previously conducted an evaluation of Human Resources to identify strengths and risks that could impact Human Resources’ organizational effectiveness. TVA OIG’s report identified several strengths and risks along with recommendations for addressing those risks. In response to a draft of that report, TVA Human Resources management provided their management decision. The objective of this follow-up evaluation was to assess management’s actions to address risks included in the initial organizational effectiveness evaluation.</p> <p>In summary, TVA OIG determined Human Resources has taken actions to address some of the risks outlined in their initial organizational effectiveness evaluation. However, issues related to (1) differences between Human Resource Generalist and senior Human Resources roles; (2) execution risks, including the Human Resources Generalist transition to a more strategic role, employee feedback mechanism, and role clarity; and (3) ethical and inclusion concerns remain unresolved.</p> <p>Human Resources management plans to address risks related to differences in Human Resources Generalist and senior Human Resources Generalist roles and execution risks as part of their organizational redesign (referred to as evolution), which is currently underway. Human Resources management is also continuing efforts to address ethical and inclusion risks.</p>	Recruitment, Hiring, and Staffing
TVA	Organizational Effectiveness Follow-up—Human Resources Employee Health (Evaluation 2018-15583; September 2018)	<p>The TVA OIG previously conducted an evaluation of Human Resources to identify strengths and risks that could impact Human Resources’ organizational effectiveness. The TVA OIG’s report identified several strengths and risks along with recommendations for addressing those risks. In response to a draft of that report, TVA Human Resources management provided their management decision. The objective of this follow-up evaluation was to assess management’s actions to address risks included in the TVA OIG’s initial organizational effectiveness evaluation for one of the organization’s three departments—Employee Health.</p> <p>In summary, TVA OIG determined Employee Health has taken actions to address some of the risks outlined in the TVA OIG’s initial organizational effectiveness evaluation. However, two of the five recommendations remain unresolved, including (1) the medical case management process and (2) inclusion concerns.</p>	Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
TVA	Organizational Effectiveness Follow-up—Human Resources (Final Report—Evaluation 2019-15687; October 2019)	The TVA OIG previously conducted an evaluation of Human Resources to identify strengths and risks that could impact Human Resources’ organizational effectiveness. The report identified several strengths and risks along with recommendations for addressing those risks. In response to that report, TVA Human Resources management provided their management actions to address risks from the TVA OIG’s initial organizational effectiveness evaluation. The TVA OIG’s follow-up evaluation reflected management had taken actions to address several risks outlined in the initial evaluation. However, three recommendations remained unresolved, including (1) differences between Human Resource Generalist and Senior Human Resources roles; (2) execution risks, including role clarity and implementation of a feedback mechanism; and (3) ethical and inclusion concerns. The objective of this follow-up evaluation was to assess actions taken to address concerns identified in the initial organizational effectiveness evaluation. In summary, the TVA OIG determined Human Resources has taken actions to address the remaining risks.	Recruitment, Hiring, and Staffing
SEC	Audit of the Representation of Minorities and Women in the SEC’s Workforce (Report No. 528; November 2014)	The SEC OIG found that the SEC has made efforts to promote diversity. In addition, the SEC’s Office of Equal Employment Opportunity did not identify any proven employment discrimination for cases closed between FY 2011 and FY 2013. However, some minority groups and women (1) were underrepresented in the SEC workforce, (2) received relatively fewer and smaller cash awards and bonuses, (3) experienced statistically significant lower performance management and recognition scores, and (4) filed equal employment opportunity complaints at rates higher than their percentage of the workforce.	Performance, Recognition, and Awards
FEC	Root Causes of Low Employee Morale Study (Report No. OIG-15-06; July 2016)	<p>The FEC OIG hired Job Performance Systems to report on the root causes of the Federal Election Commission’s low morale. The study was motivated by past Federal Employee Viewpoint Surveys that place the FEC low on the Partnership for Public Service’s ranking of The Best Places to Work in the Federal Government. Additionally, the FEC OIG had received complaints from employees about the low employee morale.</p> <p>The FEC OIG found that the major causes of low morale can be grouped in the following five categories: (1) Commissioners’ Statements and Actions; (2) Ineffective Management; (3) Poor Communications; (4) Lack of Accountability; and (5) Other (Perceived Lack of Diversity and Little Career Development and Limited Promotion Opportunities).</p>	Promotions and Professional Development

OIG	Title	Summary	Themes
OPM	Audit of the U.S. Office of Personnel Management's Retirement Services Disability Process (Report Number: 4A-RS-00-19-038; October 2020)	<p>The objectives of this audit were to (1) determine if the OPM Retirement Services and Support, Claims I, and the Appeals groups are following laws, regulations, policies, and procedures; (2) ensure management is providing oversight reviews; and (3) determine if controls are in place to ensure staff are trained to perform their duties.</p> <p>The OPM OIG determined that OPM's Retirement Services office correctly processed Disability Claims, in accordance with Chapter 83, Subchapter III, Civil Service Retirement System and Chapter 84, Federal Employee Retirement System of Title 5 United States Code and OPM's Civil Service Retirement System/Federal Employee Retirement System Handbook.</p> <p>However, the OPM OIG identified four areas where Retirement Services' controls over its disability process should be strengthened:</p> <ul style="list-style-type: none"> • Retirement Services lacks the proper documentation to verify training for the Boyers Disability Section, Appeals, and Claims I staff. • Retirement Services could not support that it met its requirement to annually reevaluate cases initially approved for disability retirement on a temporary basis until the annuitant reaches age 60, also known as the Medical Call-ups process. • Claims I Quality Assurance Reviews were incomplete and not documented. • The OPM OIG analyzed 61 out of 6,956 Retirement Disability Receipts for fiscal year 2019 and identified issues with processing timeliness and case tracking. 	Training and Awareness

OIG	Title	Summary	Themes
VA	Healthcare Inspection Summarization of Select Aspects of the VA Pacific Islands Health Care System Honolulu, Hawaii (Report No. 15-04655-347; September 2016)	<p>The VA OIG Office of Healthcare Inspections conducted a review of the VA Pacific Islands Health Care System (VAPIHCS), Honolulu, Hawaii. The purpose of the review was to collect and summarize supplementary data in support of a Combined Assessment Program review completed in August 2015 and to respond to letters sent by Senator Mazie K. Hirono expressing concerns about access to care, travel benefits, cultural diversity, homeless services, and mental health care. The VA OIG also reviewed the Veterans Health Administration’s 6-point plan to address capacity and access to care within VAPIHCS primary care clinics.</p> <p>The VA OIG found that VAPIHCS is taking actions to ensure staff members are culturally sensitive and competent.</p> <p>In general, employees and Veterans Service Officer representatives interviewed did not report concerns regarding cultural competence and sensitivity at VAPIHCS. A majority of the VAPIHCS staff had completed cultural competence training and, in some cases, additional training offered by VAPIHCS. Further, neither the Hawaii Primary Care Association nor Papa Ola Lokahi reported receiving complaints from patients about cultural insensitivity at VAPIHCS. In October 2015, VAPIHCS leadership and program managers met with representatives from Papa Ola Lokahi to discuss new employee orientation and annual cultural sensitivity training opportunities. As of August 2016, discussions continue but no specific actions have been taken.</p>	Training and Awareness
CFPB	The Board Can Enhance Its Diversity and Inclusion Efforts (Board Report: 2015-MO-B-006; March 31, 2015)	The CFPB OIG conducted this audit in response to a congressional request for information on the Board of Governors of the Federal Reserve System’s (Board) activities related to diversity and inclusion. CFPB OIG’s objective was to assess the Board’s human resources–related operations and other efforts to provide for equal employment opportunities, including equal opportunity for minorities and women to obtain senior management positions, and increase racial, ethnic, and gender diversity in the workforce.	Promotions and Professional Development Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
CFPB	The CFPB Can Enhance Its Diversity and Inclusion Efforts (CFPB Report: 2015- MO-C-002; March 4, 2015)	The CFPB OIG conducted this audit in response to a congressional request for information on the CFPB's activities related to diversity and inclusion. CFPB OIG's objective was to assess the CFPB's human resources–related operations and other efforts to provide for equal employment opportunities, including equal opportunity for minorities and women to obtain senior management positions, and increase racial, ethnic, and gender diversity in the workforce.	Promotions and Professional Development Recruitment, Hiring, and Staffing
TVA	Organizational Effectiveness Follow-up—Human Resources' Employee Health (Final Report—Evaluation 2019-15688; October 2019)	<p>The TVA OIG previously conducted an evaluation of Human Resources to identify strengths and risks that could impact Human Resources' organizational effectiveness. TVA OIG's report identified several strengths and risks along with recommendations for addressing those risks. In response to that report, TVA Human Resources management provided their management decision. The TVA OIG subsequently completed a follow-up organizational effectiveness evaluation for one of the organization's three departments—Employee Health. Follow-up evaluation reflected management had taken actions to address several risks outlined in the initial evaluation. However, two recommendations remain unresolved, including (1) execution risks related to the refinement of the medical case management process and (2) inclusion concerns.</p> <p>The objective of this follow-up evaluation was to assess actions taken to address the concerns identified in the initial organizational effectiveness evaluation. In summary, the TVA OIG determined Employee Health has taken action to address the execution risks related to the medical case management process. Also, the inclusion concerns identified in their original evaluation were related to Employee Health's placement in Human Resources. Since that evaluation, the Chief Human Resources Office has reorganized, and Employee Health is now located under a different Chief Human Resources Office business unit (Compensation and Benefits).</p>	Promotions and Professional Development Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
DOL	ETA Could Not Determine the Impact Its Face Forward Program Had on Participants Ages 17 and Under (Report Number: 02-20-001-03-390; March 2020)	<p>The goals and metrics established by the Employment and Training Administration were not reliable indicators of Face Forward's performance. As a result, the Employment and Training Administration could not determine the impact its Face Forward program had on participants ages 17 and under. Grantees also did not achieve performance goals for key outcomes. The DOL OIG based their conclusions on the following:</p> <p>The reported performance outcomes for participants aged 17 and under were unreliable as the underlying performance data was incomplete. Only 5,278 (58 percent) of the 9,028 participants in this age group were included. Reported recidivism rates for participants were also unreliable because of incomplete performance data. Only 3,989 (28 percent) of the 14,128 participants were tracked by grantees for potential recidivism.</p> <p>Reported rates for other key performance indicators were unreliable due to inaccurate calculations. Reported performance for Industry Recognized Credentials, Employment Placement, Employment Retention, High School Diploma Attainment, School Retention, and Recidivism were overstated by 37 to 52 percent.</p> <p>Despite the incomplete data and overstatements, reported performance indicated grantees did not achieve key goals for high school diploma attainment, expungements, and credentialing.</p>	Accessibility and Equity in Government Programs
EPA	Improved EPA Oversight of Funding Recipient's Title VI Programs Could Prevent Discrimination (Report No. 20-E-0333; September 2020)	<p>The External Civil Rights Compliance Office (ECRCO) has not fully implemented an oversight system to provide reasonable assurance that organizations receiving EPA funding are properly implementing Title VI. As an initial matter, ECRCO does not conduct proactive compliance reviews to determine funding recipients' compliance with Title VI. Instead, only once an investigation has been lodged will ECRCO review the foundational elements of the recipient's nondiscrimination program using a checklist. This checklist documents the existence of a nondiscrimination program but does not necessarily document the successful implementation of Title VI. OIG used the checklist to conduct a limited review of the nondiscrimination programs in all 50 States and 3 Territories. They found that 81 percent lacked some of the required foundational elements on their websites. Meanwhile, ECRCO does not systematically collect program data from EPA funding recipients, and State personnel advised that they need training and guidance to help them address discrimination complaints related to permits and cumulative impacts. Three of the seven States OIG interviewed indicated that they had not received training from ECRCO.</p>	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	<p>The Office for Civil Rights' Complaint Dismissal Process (A19T0002, May 11, 2021)</p>	<p>ED OIG found that the Office for Civil Rights needs to improve its tracking related to the reopening of complaints previously dismissed under its March 2018 Case Processing Manual. ED OIG found no indication that complaints were not being dismissed in accordance with revisions made to the Case Processing Manual in November 2018. Complaints dismissed under the March 2018 Case Processing Manual were generally dismissed in accordance with policy. However, some complaints dismissed did not always meet the criteria for dismissal, some complaints that did meet the criteria for dismissal were not always dismissed, and case files did not always contain required documentation. In addition, several of the complaints dismissed were already in an active resolution phase and/or an investigation had been completed.</p>	<p>Accessibility and Equity in Government Programs</p>
ED	<p>Ohio Department of Education's and Selected Virtual Charter Schools' Internal Controls Over Individualized Education Programs (A03S0006, March 1, 2020)</p>	<p>ED OIG found that the Ohio Department of Education (Ohio) generally had sufficient internal controls to ensure that local educational agencies developed individualized education programs in accordance with Federal and State requirements for children with disabilities who attend virtual charter schools and that these students were provided with the services described in their individualized education programs. These internal controls included developing model policies and procedures; monitoring local educational agencies; and providing technical assistance, guidance, and training. However, Ohio could strengthen its monitoring process to ensure that local educational agencies also have written procedures on how they implemented the model policies for individualized education program development and how they provided and documented service delivery for students with disabilities. Ohio should also require sponsors to timely report significant compliance issues found during their monitoring reviews.</p> <p>Regarding the two virtual charter schools reviewed, ED OIG found that Ohio Virtual Academy generally had sufficient internal controls to ensure that it developed individualized education programs in accordance with Federal and State requirements for children with disabilities and provided students with the services described in their programs. However, Ohio Virtual Academy should ensure that its processes for documenting related services are followed. ED OIG found that Tri-Rivers Educational Computer Association Digital Academy generally had sufficient internal controls; however, it did not ensure it maintained individualized education programs that included all the required information describing the services that students needed for all the students included in the review. Further, Tri-Rivers Educational Computer Association Digital Academy did not have sufficient internal controls to ensure that it provided students with the services described in their individualized education programs, and it did not have written procedures for its service provider invoice review process. It did, however, have sufficient documentation to support that related services were delivered to the students ED OIG reviewed.</p>	<p>Accessibility and Equity in Government Programs</p>

OIG	Title	Summary	Themes
ED	<p>Pennsylvania Department of Education’s and Selected Virtual Charter Schools’ Internal Controls Over Individualized Education Programs (A02T0004, December 2, 2020)</p>	<p>ED OIG found that the Pennsylvania Department of Education generally had sufficient internal controls to ensure that local educational agencies developed individualized education programs in accordance with Federal and State requirements for children with disabilities who attend virtual charter schools and that these students were provided with the services described in their individualized education programs. However, Pennsylvania Department of Education could strengthen its monitoring process to ensure that local educational agencies also have written procedures on how they implemented the model policies for individualized education program development and how they provided and documented service delivery for students with disabilities.</p> <p>Regarding the two virtual charter schools reviewed, ED OIG found that Pennsylvania Virtual Charter School had sufficient internal controls to ensure that it developed individualized education programs in accordance with Federal and State requirements for children with disabilities and provided students with the services described in their programs. Commonwealth Charter Academy did not have sufficient internal controls to ensure that it developed individualized education programs in accordance with Federal and State requirements for children with disabilities and provided students with the services described in their programs. Specifically, Commonwealth Charter Academy did not have sufficient written procedures for individualized education program development and for documenting the delivery of services for students with disabilities.</p>	<p>Accessibility and Equity in Government Programs</p>

OIG	Title	Summary	Themes
ED	Office of the Chief Privacy Officer's Processing of Family Educational Rights and Privacy Act Complaints (A09R0008, November 26, 2018)	<p>ED OIG found that the Office of the Chief Privacy Officer did not have controls to ensure that it timely and effectively processed Family Educational Rights and Privacy Act (FERPA) complaints during the audit period. The Office of the Chief Privacy Officer had a longstanding backlog of unresolved FERPA complaints. Officials in the office estimated they were about 2 years behind on complaint investigations, but ED OIG concluded that the backlog appeared to be significantly greater. Multiple factors contributed to the backlog, including a lack of resources to timely investigate all complaints and unresolved FERPA policy issues that impede complaint investigations. The Office of the Chief Privacy Officer had an opportunity to reduce or eliminate the complaint backlog beginning in FY 2015 when it received authority to hire additional staff for the student privacy function. However, despite the significant complaint backlog, the Office of the Chief Privacy Officer dedicated the majority of the new resources to performing FERPA work unrelated to resolving existing complaints.</p> <p>ED OIG also identified a number of weaknesses in the Office of the Chief Privacy Officer processes for resolving complaints. The tracking process for FERPA complaints was inadequate and did not enable the office to identify the number of individual complaints it had received or track the status of complaints through the resolution process. As a result, the office did not have reliable data on its effectiveness in resolving complaints and could not set meaningful performance goals or evaluate its own performance. The office's processes also lacked consistency and in some cases were not appropriate, in part because the office had not implemented written policies and procedures to guide personnel. The Office of the Chief Privacy Officer also did not always communicate effectively with complainants during the complaint resolution process. Finally, the Office of the Chief Privacy Officer generally processed complaints in the order they were received rather than evaluating each complaint's risk and prioritizing the complaints with the highest risk or most significant potential adverse impact.</p>	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	Office of Special Education Programs' Differentiated Monitoring and Support (A09R0004 , October 25, 2018)	ED OIG found that the Office of Special Education Programs (OSEP) needed to enhance its implementation of the differentiated monitoring and support component under the results driven accountability initiative to help ensure that it plans and conducts differentiated monitoring and support properly and consistently across all States. Specifically, OSEP did not have sufficient policies and procedures for how personnel should perform and document the four phases of differentiated monitoring and support—(1) performing organizational assessments, (2) designating engagement levels, (3) issuing notices and charts to States, and (4) conducting and documenting tasks and activities. OSEP developed a partial framework for the phases of differentiated monitoring and support including templates for personnel to record information for each differentiated monitoring and support phase, written instructions for performing organizational assessments, and written guidance for documenting tasks and activities. However, OSEP did not develop written policies or procedures for the differentiated monitoring and support phases on designating engagement levels and issuing notices and charts to States. OSEP also did not have a document retention policy for differentiated monitoring and support. Further, the written instructions and guidance that OSEP developed for differentiated monitoring and support lacked sufficient detail on key processes that personnel should perform or information that personnel should record in the templates. OSEP's written instructions also did not provide guidance on how OSEP personnel should review information related to differentiated monitoring and support such as organizational assessments or notices and charts issued to States. In addition to these issues, ED OIG identified limitations in OSEP's ability to obtain or verify the Technical Assistance Accessed data it used in its organizational assessments.	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	Department's Oversight of the Indian Education Formula Grant Program (A19Q0002, September 28, 2018)	ED OIG found that significant improvements were needed in the Office of Indian Education's oversight of Indian Education Formula Grant program grantees' performance and use of funds. Specifically, ED OIG found that while the Office of Indian Education conducts some monitoring, the monitoring activities it does conduct are insufficient with regard to ensuring that grantees are making progress toward meeting program goals and spending grant funds appropriately. The Office of Indian Education's efforts related to monitoring are primarily limited to ensuring grantees are drawing down and spending grant funds by established deadlines and closing out the grant. For key program monitoring activities such as desktop monitoring, student count verification, and the collection and review of Annual Performance Reports, ED OIG found a lack of written comprehensive procedures, follow-through, and documentation. Additionally, while the Office of Indian Education developed plans to monitor grantees for FYs 2014 and 2015, it has not developed clear procedures for identifying which grantees to monitor, including taking into account multiple risk assessment factors. While the Office of Indian Education does collect some data on grantee performance and use of funds, there is little evidence that the data are used to assist grantees in implementing the program successfully. Without adequate monitoring of grantee progress and use of funds, the Office of Indian Education has little assurance as to whether Indian Education Formula Grant program grantees are making progress toward program goals and objectives and spending funds appropriately.	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	New York State’s and Selected District’s Implementation of Selected Every Student Succeeds Act Requirements under the McKinney-Vento Homeless Assistance Act (A03Q0005, March 29, 2018)	<p>ED OIG found that both the New York State Department of Education (New York) and the local educational agencies reviewed (New York City Department of Education, Uniondale Union Free School District, and Lackawanna City School District) could strengthen their internal controls to help ensure homeless student data are accurate and complete, that local educational agencies are in compliance with Every Student Succeeds Act requirements, and that they are reporting all unaccompanied youths. Although New York generally provided effective oversight of the local educational agencies and coordinated with other entities to implement selected Every Student Succeeds Act requirements related to identifying and educating homeless children and youths, ED OIG found that it had not yet completed updating its policies and procedures, did not require local educational agencies to submit final documentation in response to monitoring findings, and was not ensuring that local educational agencies were reporting all unaccompanied youths. New York needed to improve its oversight of local educational agency data reporting, documenting its policies and procedures, following up to ensure that findings from monitoring reviews are appropriately resolved, and providing technical assistance related to the reporting of homeless student data for unaccompanied youths.</p> <p>The three local educational agencies reviewed generally implemented selected Every Student Succeeds Act requirements related to coordinating services and identifying, educating, and reporting on homeless children and youth, but they did not ensure that their policies were in line with current practices. Specifically, New York City’s and Lackawanna’s homeless education policies were outdated and had not been revised to include the Every Student Succeeds Act requirements, and Uniondale had not documented its data entry policies and procedures and the roles and responsibilities of officials responsible for informing parents or guardians of homeless students of the educational and related opportunities they are entitled to under the McKinney-Vento Act. The local educational agencies should update and document their policies and procedures to strengthen their internal controls.</p>	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	Rehabilitation Services Administration’s Internal Controls Over Case Service Report Data Quality (A03N0006, December 8, 2016)	<p>ED OIG found that the Rehabilitation Services Administration (RSA) did not have adequate internal controls to provide reasonable assurance that RSA-911 report data State vocational rehabilitation agencies submitted were accurate and complete. Specifically, RSA’s monitoring procedures did not require program staff to determine whether State vocational rehabilitation agencies had established and implemented adequate internal controls that provided reasonable assurance that their RSA-911 report data were accurate and complete, nor did the procedures require program staff to perform any testing of the data during monitoring visits. In addition, RSA did not require State vocational rehabilitation agencies to certify that the RSA-911 report data submitted were accurate and complete. Lastly, ED OIG found that although RSA’s edit check programs provided some level of assurance regarding the completeness of RSA-911 report data these agencies submitted, RSA had not properly documented its procedures on the use of these programs.</p>	Accessibility and Equity in Government Programs
ED	Department’s Oversight of the Rural Education Achievement Program (A19P0006, September 12, 2016)	<p>ED OIG found that improvements were needed in the Department’s Office of School Support and Rural Programs’ monitoring of Rural Education Achievement Program grantees performance and use of funds. Specifically, School Support and Rural Programs had conducted very limited monitoring to determine whether Rural Education Achievement Program grantees are making progress toward program goals or spending grant funds in accordance with statutory and regulatory guidelines. Additionally, ED OIG noted that while School Support and Rural Programs does collect some data on grantees’ performance and use of funds, there is little evidence that any of the data is used to inform monitoring efforts or assist grantees in meeting program goals, even though grantees appear to be having difficulty meeting established performance targets. Without adequate monitoring of grantee progress and use of funds, School Support and Rural Programs has little assurance as to whether grantees are making progress toward program goals and objectives and little to no insight regarding what grantees are using grant funds for, thereby significantly decreasing the likelihood that it will be able to detect any instances where grantees are using funds for unallowable purposes.</p> <p>ED OIG also found that the Department is involved in various internal and external rural education coordination efforts and that these efforts appear to be effective, as it has placed a greater emphasis on internal and external rural coordination activities in the last several years. With effective coordination, the Department has more assurance that it is maximizing its resources and efforts in the area of rural education and may be able to produce a greater benefit to the public than it could otherwise achieve on its own.</p>	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	Pennsylvania's Department of Labor and Industry, Office of Vocational Rehabilitation's Case Service Report Data Quality (A03P0002, March 2, 2016)	ED OIG found that the Pennsylvania Department of Labor and Industry, Office of Vocational Rehabilitation (PA OVR) had adequate internal controls to provide reasonable assurance that its RSA-911 report data were complete but did not have adequate internal controls to ensure that its 2013 RSA-911 report data were accurate and adequately supported. Specifically, PA OVR lacked policies and procedures to require verification of the data entered into participants' case files and for its RSA-911 reporting process and lacked an adequate monitoring process to ensure that data were accurate and required documentation was maintained in participant case files. In addition, PA OVR did not have written policies and procedures for its RSA-911 reporting process. ED OIG testing of data that PA OVR reported to RSA found a significant number of unverifiable data entries for data elements that RSA used to calculate PA OVR's 2013 performance indicator results. Consequently, ED OIG has no assurance that the performance indicator results that the Rehabilitation Services Administration calculated were reliable. The Rehabilitation Services Administration uses the performance indicator results to determine whether PA OVR meets established evaluation standards. As a result, Rehabilitation Services Administration may have improperly determined PA OVR's successful performance on the evaluation standards for the 2013 reporting period.	Accessibility and Equity in Government Programs
ED	Opportunities for Ohioans with Disabilities' Case Service Report Data Quality (A03P0001, March 1, 2016)	ED OIG found that Opportunities for Ohioans with Disabilities had adequate internal controls to ensure that the data it reported to Rehabilitation Services Administration were complete. However, Opportunities for Ohioans with Disabilities did not have adequate internal controls to ensure that its 2012 RSA-911 report data were accurate and adequately supported. Specifically, Opportunities for Ohioans with Disabilities (1) lacked policies and procedures to require verification of the data entered into participants' case files and (2) lacked an adequate monitoring process to ensure that data were accurate and required documentation was maintained in participant case files. In addition, ED OIG testing of the data that Opportunities for Ohioans with Disabilities reported to the Rehabilitation Services Administration found a significant number of incorrect and unverifiable data entries for data elements that Rehabilitation Services Administration used to calculate Opportunities for Ohioans with Disabilities' 2012 performance indicator results. Consequently, ED OIG has no assurance that the performance indicator results that Rehabilitation Services Administration calculated were reliable. The Rehabilitation Services Administration uses the performance indicator results to determine whether Opportunities for Ohioans with Disabilities meets established evaluation standards. As a result, the Rehabilitation Services Administration may have improperly determined Opportunities for Ohioans with Disabilities' successful performance on the evaluation standards for the 2012 reporting period.	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	California Department of Rehabilitation Case Service Report Data Quality (A0900008, December 10, 2015)	ED OIG found that the California Department of Rehabilitation did not have adequate data quality controls to ensure that information it reported to the Rehabilitation Services Administration was accurate, complete, and adequately supported. Specific control weaknesses ED OIG identified were (1) lack of an adequate control to prevent staff from changing the date that a participant’s case was closed in its Accessible Web-Based Activity Reporting Environment (AWARE) case management system; (2) insufficient requirements that personnel maintain documentation to corroborate key dates for application, eligibility, case closure, and employment data entered into AWARE; (3) lack of guidance for determining effective dates for participants’ plans to obtain employment and cost data for purchased services provided to participants; and (4) insufficient manager oversight to provide assurances that data were accurate and required documentation was maintained in participant files or in AWARE. ED OIG testing of data that California Department of Rehabilitation reported to the Rehabilitation Services Administration showed that most of the data elements in the review contained significant data errors (estimated error rates exceeding 5 percent) that could undermine the Rehabilitation Services Administration’s ability to effectively evaluate the California Department of Rehabilitation’s performance or a significant unverifiable data rate (estimated unverifiable data rate exceeding 5 percent) that would raise questions about the reliability of data that the California Department of Rehabilitation reported. The Rehabilitation Services Administration uses some of the data elements ED OIG tested to calculate individual performance indicators, which are then used to determine whether the California Department of Rehabilitation is meeting evaluation standards.	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	Resolution of Discrimination Complaints by the Department's Office for Civil Rights (A19N0002, December 10, 2015)	<p>ED OIG found that the Office for Civil Rights generally resolves discrimination complaints in a timely and efficient manner and in accordance with applicable policies and procedures. Specifically, the Office for Civil Rights timely resolves discrimination complaints at a high overall rate and does not have a large backlog of unresolved cases. However, ED OIG noted that increasing workload and decreasing resources could have a negative impact on complaint resolution over time. ED OIG also determined that the Office for Civil Rights generally resolves discrimination complaints in accordance with its established policy. The Office for Civil Rights has generally developed clearly defined procedures that account for different types of discrimination complaints and management has created a control environment that ensures the investigative teams understand the importance of compliance with policies and procedures. As a result, the Office for Civil Rights is able to ensure that complaints are processed and resolved consistently, efficiently, and effectively across the regions, in line with the office's statutory and regulatory responsibilities.</p> <p>However, ED OIG determined that two regional offices were not appropriately maintaining separate files for the Early Complaint Resolution process, and in some instances destroyed or discarded documentation obtained during that process. Failure to separate Early Complaint Resolution records from investigative case files may compromise the confidentiality of the Early Complaint Resolution process and may impact the impartiality and objectivity of the staff investigating the complaint should Early Complaint Resolution not be successful. Additionally, failure to retain Early Complaint Resolution records can provide the appearance that the Office for Civil Rights is not competently managing the information it receives when resolving discrimination complaints. After learning of these practices, headquarters officials took immediate action to correct the issue.</p>	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	Payback Provisions of the Personnel Development to Improve Services and Results for Children with Disabilities Program (A19O0004, March 3, 2015)	ED OIG found the Personnel Development to Improve Services and Results for Children with Disabilities Program (PDP) results reported by the Office of Special Education Programs to be encouraging; however, data limitations and quality issues limited stakeholders' ability to assess PDP effectiveness. Specifically, only slightly more than half of the PDP scholars in the review who had graduated or otherwise exited their respective program had either completed or were working toward completing their service obligation; the rest had not yet begun work or were still within the program's 5-year grace period. As a result, it was too early in the process to adequately assess program effectiveness. In addition, although related Government Performance and Results Act measures provided some insight into program effectiveness, ED OIG identified certain limitations and quality issues with information on PDP scholars that OSEP and its former contractor used in compiling some performance data, including issues related to the total number of scholars served and the reported service obligation data. The Department also had limited involvement in monitoring the program's payback requirement, including not monitoring its contractor's oversight of the payback requirement as diligently and effectively as it could have. ED OIG also identified problems with the methodology used to calculate results that limited stakeholders' ability to draw reliable conclusions on program effectiveness.	Accessibility and Equity in Government Programs
ED	Federal Student Aid's Total and Permanent Disability Discharge Process (A02Q0006, June 16, 2020)	The objective of the audit was to determine whether Federal Student Aid ensured that (1) its total and permanent disability discharge process operated in accordance with Federal program requirements and (2) accurate information on student loan discharges was entered into Federal Student Aid's system of records. The total and permanent disability discharge process relieves borrowers who are totally and permanently disabled according to Federal program requirements of repaying their Federal student loans or completing their grant service obligations. ED OIG found that Federal Student Aid appropriately approved and rejected the applications and applied appropriate criteria to approve and reject individual total and permanent disability discharge applications in accordance with Federal program requirements, and that its servicing contractor generally serviced those accounts throughout the total and permanent disability discharge process in accordance with Federal program requirements. ED OIG also found that Federal Student Aid ensured that accurate information on student loan discharges was entered into the total and permanent disability databases. However, ED OIG identified design weaknesses in Federal Student Aid's control activities for the total and permanent disability discharge application review process that may negatively affect the operating efficiency and effectiveness of the process and increase the risk that Federal Student Aid approves applications that are inaccurate or incomplete.	Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
ED	The Department’s Reviews of Student Loan Servicers’ Compliance with the Servicemembers Civil Relief Act (February 29, 2016)	In August 2015, U.S. Senators Patty Murray, Elizabeth Warren, and Richard Blumenthal requested that ED OIG conduct an independent examination of the adequacy and accuracy of the Department’s reviews of student loan servicers’ compliance with the Servicemembers Civil Relief Act requirement to provide eligible servicemembers with an interest rate reduction on certain Federal student loans. Concerns were raised about the Department’s conclusion contained in its May 26, 2015, press release that “in less than 1 percent of cases, borrowers were incorrectly denied the 6 percent interest rate cap required by the laws.” ED OIG identified flaws in the Department’s sampling design that resulted in the Department testing few borrowers eligible for the Servicemembers Civil Relief Act benefit, errors in the program reviews it conducted, and inconsistent and inadequate corrective actions for the errors it identified for the period reviewed. As a result, ED OIG determined that the Department’s press release of May 26, 2015, was unsupported and inaccurate. To address the issues with servicemembers’ benefits, the Department designed new procedures that, if properly implemented, should provide for all eligible borrowers to receive the Servicemembers Civil Relief Act benefit as of July 2014.	Accessibility and Equity in Government Programs
FCA	Inspection Report on FCA’s Implementation Efforts for the 2017-2018 Fairness and Inclusiveness Assessment (Report No. 1-20-01; July 2020)	<p>The FCA OIG completed an inspection of FCA’s implementation efforts for the 2017–2018 Fairness and Inclusiveness Assessment (assessment). The objective of the inspection was to analyze FCA’s implementation of diversity and inclusion efforts, and the FCA OIG limited their scope to the assessment. They did not review FCA’s agency-wide diversity, inclusion, and equal employment opportunity program.</p> <p>The FCA OIG found that FCA had taken preliminary steps to assess and implement recommendations in the contractor’s assessment. However, it identified areas for improvement in FCA’s implementation and tracking of recommendations in the assessment. The FCA OIG made five recommendations to improve diversity and inclusion efforts resulting from the assessment. FCA agreed to the five recommendations and provided appropriate corrective actions for each recommendation.</p>	Business Supplier Diversity Promotions and Professional Development Recruitment, Hiring, and Staffing

OIG	Title	Summary	Themes
FDIC	Minority Depository Institution Program at the FDIC (Report No. Eval-19-002; September 2019)	Minority Depository Institutions play a vital role in assisting minority and underserved communities and are resources to foster the economic viability of these communities. In keeping with the requirements of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, the FDIC adopted a Minority Depository Institutions Policy Statement in 2002, which describes its interpretation of ways to preserve and promote Minority Depository Institutions and implement the statutory goals. The objective of the evaluation was to examine the FDIC's actions to preserve and promote Minority Depository Institutions and assess whether the Minority Depository Institutions Program is achieving its goals.	Accessibility and Equity in Government Programs Business Supplier Diversity
PBGC	Use of Women-Owned Small Business Federal Contracting Program (Report No. AUD 2019-11/PA-18-130; July 2019)	PBGC OIG found that PBGC awarded just one Women Owned Small Business set-aside in FY 2018. This award was performed properly but limited the assessment of PBGC's compliance. PBGC OIG also reviewed the organizational alignment and duties of the PBGC's Office of Small and Disadvantaged Business Utilization Director. While PBGC complied with the Small Business Act (the Act) requirement of appointing an Office of Small and Disadvantaged Business Utilization Director, the Corporation has not complied with the requirements for aligning the Director within the reporting hierarchy of the Corporation. Furthermore, the Director has not provided training to contracting officers for the various small business programs. As a result, firms in SBA's contracting assistance programs may not be receiving Federal contract opportunities through exclusive set-aside and sole-source contracts meant to ensure small businesses receive a fair share of federal contracting dollars. The report contained two recommendations related to the organizational alignment of the Office of Small and Disadvantaged Business Utilization and training of staff on the current Women Owned Small Business program. PBGC management agreed with the recommendations.	Business Supplier Diversity Accessibility and Equity in Government Programs

OIG	Title	Summary	Themes
USDA	In re Black Farmers Discrimination Litigation - Adjudicated Claims (Audit Report: 50601-0003-21; September 2015)	<p>The USDA OIG conducted a performance audit of the completed claims process for the Black Farmers Discrimination Litigation settlement based on statistical samples of adjudicated claims.</p> <p>The USDA OIG found that awards were granted to eligible claimants in accordance with the In re Black Farmers Discrimination Litigation settlement agreement. Nothing came to the USDA OIG's attention to indicate that the Claims Administrator and the Track A and B Neutrals did not implement the claims process in accordance with the settlement agreement.</p>	<p>Accessibility and Equity in Government Programs</p> <p>Stakeholders and Partners</p>
ED	University of San Antonio's Controls Over Reporting Clery Act Crime Statistics (A09T0008, November 24, 2020)	<p>The objective of the audit was to determine whether the University of Texas at San Antonio (San Antonio) had controls to ensure that it reported complete and accurate campus crime statistics under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The review focused on San Antonio's reporting of Clery Act crime statistics related to criminal offenses, hate crimes, and Violence Against Women Act crimes. ED OIG found that the school did not have effective controls to ensure that it reported complete and accurate Clery Act crime statistics. San Antonio had processes for requesting crime statistics from local law enforcement agencies, identifying campus security authorities, processing and compiling the crime information, and reporting the annual Clery Act crime statistics by the reporting deadline. However, these processes were not effectively designed or consistently performed during the audit period and did not provide reasonable assurance that the reported Clery Act crime statistics would be complete and accurate. As a result, the statistics did not provide reliable information to current and prospective students, their families, and other members of the campus community for making decisions about personal safety and security.</p>	<p>Stakeholders and Partners</p>

OIG	Title	Summary	Themes
ED	University of North Georgia's Controls Over Reporting Clery Act Crime Statistics (A09T0006, September 11, 2020)	The objective of the audit was to determine whether the University of North Georgia (North Georgia) had controls to ensure that it reported complete and accurate campus crime statistics under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The review focused on North Georgia's reporting of Clery Act crime statistics related to criminal offenses, hate crimes, and Violence Against Women Act crimes. ED OIG found that the school did not have effective controls to ensure that it reported complete and accurate Clery Act crime statistics. North Georgia had processes for activities related to crime reporting under the Clery Act, including identifying its Clery Act geography, requesting crime statistics from local law enforcement agencies, identifying campus security authorities and collecting crime reports from them, processing and compiling the crime information, and reporting the annual Clery Act crime statistics by the reporting deadline. However, these processes did not provide reasonable assurance that the reported crime statistics would be complete and accurate. As a result, the school did not provide reliable information to current and prospective students, their families, and other members of the campus community for making decisions about personal safety and security.	Stakeholders and Partners
CFTC	Inspection and Evaluation of CFTC's Compliance with E.O. 13950, Combating Race and Sex Stereotyping (CFTC OIG 2021-IE-1; September 2020)	Executive Order 13950, section 6(c)(ii), required each agency head to request the Inspector General each year to thoroughly review and assess agency compliance with the requirements of the Executive Order in the form of a report submitted to OMB, with a current deadline of December 31, 2020. On November 9, 2020, the CFTC OIG received the required request through Summer Mersinger, acting as the senior political appointee assigned responsibility for ensuring compliance with the Executive Order, which they verbally confirmed with the Chairman. This report presents the CFTC OIG's findings. The CFTC is compliant.	Compliance with Executive Order 13950

OIG	Title	Summary	Themes
DIA	Assessment of Agency's Compliance with E.O. 13950 on Combating Race and Sex Stereotyping (Final Memorandum 2021-1002; December 2020)	<p>Based on the assessment procedures, the DIA OIG determined that DIA took steps to comply with Executive Order 13950 sections 4.1, 4.3, 5, 6.b, 6.c.i, 7.a, 7.b, and 9, and is awaiting DoD guidance for section 7.c. The DIA OIG also determined that the requirement to comply with section 6.c.iii applies to DoD, which is the Agency under the Executive Order, and not directly to DIA.</p> <p>The DIA OIG suggests the designated DIA Diversity Equality and Inclusion Lead overseeing the Executive Order training requirement implementation:</p> <ul style="list-style-type: none"> • Coordinate with the designated DoD Executive Order official to determine whether courses with diversity and inclusion components, but are primarily focused on other topics, should be paused and submitted for review. • Coordinate with the designated DoD Executive Order official to assure DIA's written disclaimer for officers using Agency time and systems to share outside trainings, webinars, learning opportunities, and collaboration opportunities related to diversity and inclusion is appropriate. • Request input from DIA officials at the Directorate and Special Office levels to confirm that the list of Diversity and Inclusion trainings submitted for review to DoD is complete. 	Compliance with Executive Order 13950
DOD	Evaluation of Department of Defense Compliance With Executive Order 13950, "Combating Race and Sex Stereotyping" (DODIG-2021-044; December 2020)	<p>The objective of this evaluation was to review and assess DoD compliance with the requirements of Executive Order 13950, "Combating Race and Sex Stereotyping." Specifically, the DOD OIG focused their evaluation on DoD compliance with the agency requirements in Sections 3 through 7 of Executive Order 13950.</p> <p>The DOD OIG determined that the DoD is in compliance with the requirements in Sections 3 and 5 of Executive Order 13950. They determined that the DoD did not fully comply with Section 4 of Executive Order 13950, which requires that Federal agencies include a contract provision in all Government contracts issued on or after November 21, 2020. Based on a nonstatistical sample of 21 DoD contracts issued from November 23, 2020, through December 1, 2020, the DOD OIG found that 19 of 21 contracts it reviewed did not contain the required contract provision.</p>	Compliance with Executive Order 13950

OIG	Title	Summary	Themes
DOE	Department of Energy's Compliance With Executive Order 13950, Combating Race and Sex Stereotyping (DOE-OIG-21-10; December 2020)	The DOE OIG found that the Department's Office of Economic Impact and Diversity, working in conjunction with the Office of Management, and the National Nuclear Security Administration, had made progress implementing the Executive Order. Specifically, the Department had complied with Executive Order agency requirements by assigning a senior political appointee in the Office of Economic Impact and Diversity to be responsible for ensuring compliance with the requirements of the Executive Order. Also, the senior political appointee appropriately requested that the OIG review the Department's compliance with the Executive Order. Finally, on November 24, 2020, the Department's Deputy Secretary issued a memorandum to the Heads of Departmental elements stating that the Department must comply with the Executive Order. The DOE OIG further noted that the Department had taken steps to comply with the Executive Order in the areas of contracts and grants, spending, and training.	Compliance with Executive Order 13950
DOI	Compliance with Executive Order 13950, "Combating Race and Sex Stereotyping" (Report No. 2021-ER-009; January 2021)	The DOI OIG reviewed DOI's compliance with four requirements from Executive Order 13950. The DOI met two of the requirements the DOI OIG reviewed and made progress toward compliance in the other two. This report was issued to the Secretary of the Interior for his information. The DOI OIG did not offer recommendations or require any further action.	Compliance with Executive Order 13950

OIG	Title	Summary	Themes
DOJ	Review of Gender Equity in the Department's Law Enforcement Components (Report Number: 18-03; June 2018)	<p>Initiated after complaints from DOJ employees and Senator Grassley, the report had four findings:</p> <ol style="list-style-type: none"> 1. Women accounted for only 16 percent of the criminal investigators in DOJ's law enforcement components and held few law enforcement executive leadership positions, and components have taken limited actions to increase the number of women in these positions. 2. Women were often underrepresented in criminal investigator promotions, while the representation of women and men in professional staff varied by agency. 3. Female criminal investigators frequently reported gender discrimination, and both men and women believed that personnel decisions, including and promotions, were based on personal relationships more than merit 4. Dissatisfaction with and mistrust about the Equal Employment Opportunity process and fear of retaliation may limit the utility of the process as a tool to address discrimination. <p>The report made six recommendations that each law enforcement component:</p> <ol style="list-style-type: none"> 1. Assess recruitment, hiring, and retention activities to identify barriers to gender equity in the workforce. 2. Develop and implement component-level recruiting, hiring, and retention strategies and goals that address the identified barriers to gender equity in the workforce. 3. Develop and implement a plan to track and analyze demographic information on newly hired staff and applicants, as appropriate, to evaluate recruitment strategies. 4. Identify and take steps to address barriers to advancement for women within the component and among different job types. 5. Develop and implement methods to improve the objectivity and transparency of the merit promotion process. 6. Develop and implement methods to address perceptions of stigmatization and retaliation associated with the Equal Employment Opportunity complaint process. 	Compliance with Executive Order 13950

OIG	Title	Summary	Themes
DOL	Review of the Department of Labor's Compliance in Implementing the Requirements of Executive Order 13950 (Report Number: 17-21-002-50-598; December 2020)	<p>Executive Order 13950 prohibits the Federal government from promoting race or sex stereotyping in the Federal workforce and Uniformed Services, and from using contracting and grant funds for any of these purposes. The Executive Order further states that Federal agencies, contractors, and grant recipients should instead foster environments devoid of hostility and should provide training that fosters inclusive workplaces because the Federal government is, and must always be, committed to the fair and equal treatment of all individuals before the law.</p> <p>The Executive Order requires agency Inspectors General to annually assess the Department's compliance with the Executive Order and report the results by December 31 to the OMB. DOL OIG determined that as of December 21, 2020, the DOL is meeting all 10 requirements of Executive Order 13950.</p>	Compliance with Executive Order 13950
EEOC	Review of EEOC's Compliance with Executive Order 13950 (Report Number 2021-002-SOIG; December 2020)	<p>The scope of the review included internal training offered to Agency employees, external training requested by Agency employees, as well as training offered to or requested by external organizations.</p> <p>To determine compliance with Executive Order 13950, the EEOC OIG conducted interviews with Agency staff who are responsible for implementing the requirements under the order and reviewed documentation for completed actions. Fieldwork was conducted between November 17, 2020, and December 2020.</p> <p>The EEOC OIG determined that the Agency is in compliance with all the requirements of the Executive Order.</p>	Compliance with Executive Order 13950

OIG	Title	Summary	Themes
FCA	Assessment of FCA's compliance with Executive Order 13950 on Combating Race and Sex Stereotyping (Report No. I-21-01; December 2020)	<p>The FCA OIG completed an inspection of FCA's compliance with Executive Order 13950. The Executive Order sets forth specific requirements for contractors, grants, agencies, and reporting to OMB and OPM. The Executive Order also required agency heads to request from their Inspector General a review of agency compliance with the requirements of the Executive Order by the end of the calendar year, and not less than annually thereafter. In accordance with this requirement, on October 5, 2020, the Board Chairman requested such a review from the FCA OIG, and this report is the response to that request.</p> <p>Based on the limited review performed, the FCA OIG found that FCA complied with the requirements of the Executive Order. FCA included required provisions in contracts, incorporated requirements of the Executive Order into FCA operations, and submitted a report to OMB with Fiscal Year 2020 spending on Federal employee training programs related to diversity or inclusion.</p>	Compliance with Executive Order 13950
NARA	Review of NARA's Progress in Implementing Executive Order 13950, Combating Race and Sex Stereotyping (Report No. 21-R-05; December 2020)	On October 23, 2020, the NARA OIG received a request from the Archivist of the United States to conduct a review. In response to this request, the NARA OIG initiated this review to assess NARA's compliance with the requirements of Executive Order 13950. Based on its limited review, the NARA OIG found NARA has generally complied with the applicable requirements of Executive Order 13950.	Compliance with Executive Order 13950
NRC	Audit of the NRC's Compliance with Executive Order 13950, Combating Race and Sex Stereotyping (OIG-21-A-03; December 2020)	The audit objective was to review and assess agency compliance with the requirements of E.O. 13950. The NRC OIG found that the NRC is in the process of becoming fully compliant with the E.O. 13950. Of the nine requirements reviewed, eight are complete and one is in progress. Taking the steps described in E.O. 13950 will help ensure that all Federal workers are treated with the individual respect they deserve and will ensure continued alignment with NRC values. In lieu of issuing report recommendations, the NRC OIG will review and assess the agency's actions for implementing E.O. 13950 during the 2021 annual compliance review.	Compliance with Executive Order 13950

OIG	Title	Summary	Themes
NRC	Audit of the DNFSB's Compliance with Executive Order 13950, Combating Race and Sex Stereotyping (DNFSB-21-A-02; December 2020)	The audit objective was to review and assess agency compliance with the requirements of E.O. 13950. The NRC OIG found that the Defense Nuclear Facilities Safety Board is in the process of becoming fully compliant with E.O. 13950. Of the nine requirements reviewed, seven are complete, one is in progress, and one is not applicable. Taking the steps described in E.O. 13950 will help ensure that all Federal workers are treated with the individual respect they deserve and that the Federal government continues to foster a workplace of respect for all. In lieu of issuing report recommendations, the NRC OIG will review and assess the agency's actions for implementing E.O. 13950 during the 2021 annual compliance review.	Compliance with Executive Order 13950
NSA	Review of the Agency's Implementation of Executive Order 13950 on Combating Race and Sex Stereotyping (AD-21-0002; December 2020)	The NSA OIG concluded that NSA has been proactive and has made significant efforts and substantial progress in implementing E.O. 13950 since its issuance on September 22, 2020. At the time of this report, NSA was waiting for guidance from DoD on changes to the Federal grants process and, according to Diversity, Equality and Inclusion, NSA is on pace to meet the January 11, 2021, date to have diversity and inclusion trainings submitted to OPM for approval. The NSA OIG did not make any recommendations to the Agency.	Compliance with Executive Order 13950
USAID	OIG's Evaluation of USAID's Compliance with Executive Order 13950 (Report Number E-000-21-001-M; December 2020)	Following the issuance of Executive Order 13950, USAID took a number of actions to implement key parts of the order. USAID paused all diversity and inclusion trainings on September 30 and appointed the Chief of Staff of USAID's Bureau for Global Health to support the implementation of the order. Further, USAID announced the formation of an executive committee and working group tasked with implementing provisions of the order. A key output of the working group was coordinating a review of USAID diversity and inclusion training among USAID operating units and reporting this information to OPM on November 12, 2020. OPM responded to the Agency's submission on December 9, 2020.	Compliance with Executive Order 13950

OIG Acronyms

<u>CFPB</u>	Consumer Financial Protection Bureau	<u>FHFA</u>	Federal Housing Finance Agency
<u>CFTC</u>	Commodity Futures Trading Commission	<u>NARA</u>	National Archives and Records Administration
<u>DIA</u>	Defense Intelligence Agency	<u>NRC</u>	Nuclear Regulatory Commission
<u>DOD</u>	Department of Defense	<u>NSA</u>	National Security Agency
<u>DOE</u>	Department of Energy	<u>OPM</u>	Office of Personnel Management
<u>DOI</u>	Department of the Interior	<u>PBGC</u>	Pension Benefit Guaranty Corporation
<u>DOJ</u>	Department of Justice	<u>SEC</u>	Securities and Exchange Commission
<u>DOL</u>	Department of Labor	<u>Smithsonian</u>	Smithsonian Institution
<u>ED</u>	Department of Education	<u>State</u>	Department of State
<u>EEOC</u>	Equal Employment Opportunity Commission	<u>TVA</u>	Tennessee Valley Authority
<u>EPA</u>	Environmental Protection Agency	<u>USAID</u>	U.S. Agency for International Development
<u>FCA</u>	Farm Credit Administration	<u>USDA</u>	U.S. Department of Agriculture
<u>FDIC</u>	Federal Deposit Insurance Corporation	<u>VA</u>	Department of Veterans Affairs
<u>FEC</u>	Federal Election Commission		