

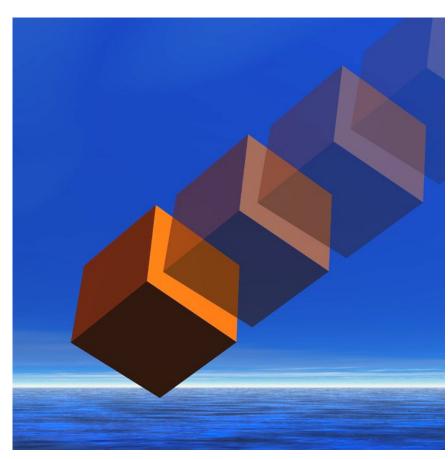
# Federal Housing Finance Board

# OFFICE OF INSPECTOR GENERAL

# STRATEGIC PLAN

FOR THE PERIOD

APRIL 1, 2004 - MARCH 31, 2009



# **FOREWORD**

The Office of Inspector General (OIG) at the Federal Housing Finance Board (Finance Board) is committed to the accomplishment of the agency's mission and the protection of the agency's assets. OIG's commitment is accomplished through: 1) practices designed to independently assess activities at the Finance Board; 2) support of the agency management's strategic plan; and 3) close coordination with agency management to prevent, detect, and correct any problems that could impede the agency's mission or result in fraud, waste, or abuse. The following five year strategic plan presents OIG's goals and objectives established to accomplish our mission and the measures we use to assess our performance.

OIG is committed to at least annually reassessing its planned activities, policies, and practices to ensure their effectiveness. Consequently, elements of the <u>Office of Inspector General Strategic Plan for April 1, 2004 to March 31, 2009</u> may change as circumstances change. Persons relying on the plan should contact OIG for any changes to the plan. In addition, OIG welcomes any comments on the strategic plan.

Edward Kelley Inspector General

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# THE OFFICE OF INSPECTOR GENERAL STRATEGIC PLAN For

# April 1, 2004 to March 31, 2009

# Table of Contents

		Page
OIG's Mission		1
Authority and	Jurisdiction of the OIG	1
planning, and	itate the Finance Board's mission and strategic goals by identifying, conducting audits designed to prevent and detect fraud, waste and nce Board Programs.	
Objective A -	- Conduct audits that support the agency's goal to have the Finance Board's program of FHLBank supervision foster safe and sound operations at each of the Federal Home Loan Banks	. 3
Objective B -	- Conduct audits that support the Finance Board's goal to ensure that the Federal Hole Loan Banks serve the nations housing finance and community investment	.5
Objective C -	- Conduct audits that support the Finance Board's goal to ensure its supervisory, managerial, and legal resources support effective, efficient, and responsive FHLBanks supervision, regulation, and housing mission oversight	. 7
possible crimi	nduct investigations to facilitate the proper disposition of allegations of inal violations and possible administrative abuses involving Finance yees and/or programs	
Objective A -	- Ensure the timely and proper referral of possible criminal violations to the Department of Justice	9
Objective B -	- Facilitate Finance Board management's administrative adjudication of matters involving possible administrative abuses by Finance Board employees or in the operation of Finance Board programs	11

**Goal III** - Facilitate the Finance Board's development of effective operations, policies, and procedures that address all agency responsibilities prescribed in applicable laws, regulations, and executive orders.

Objective A – Identify and review laws and regulations that impact Finance Board programs and operations for the purpose of assuring all agency responsibilities are met and that such laws and regulations do not contribute to waste and abuse in Finance Board operations
Objective B – Review existing and proposed Finance Board policies and procedures to assess their compliance with laws and regulations, their economy and efficiency and their susceptibility to fraud, waste, abuse
Goal IV - Educate Finance Board staff, the Congress, and others on the various duties and responsibilities of FHFB-OIG and FHFB-OIG operations while developing and maintaining positive working relationships
Objective A – Educate Finance Board staff at all levels, the Congress, and Others on the various duties and responsibilities of FHFB-OIG17
Objective B – Develop and maintain positive working relationship with Finance Board management, the Congress, OMB and Finance Board staff19
Audit UniverseExhibit 1
Five Year Audit PlanExhibit 2
Annual Audit PlanExhibit 3

# OFFICE OF INSPECTOR GENERAL STRATEGIC PLAN For

April 1, 2004 - March 31, 2009

#### OIG'S MISSION

The Office of Inspector General's (OIG) mission is to support the agency's efforts to implement its strategic plan through economy, efficiency, and integrity in agency operations. This document describes OIG's plan for discharging its ongoing statutory responsibilities under the Inspector General Act of 1978, as amended (IG Act), and for meeting its operational objectives for the period from April 1, 2004 to March 31, 2009. OIG recognizes that the Federal Housing Finance Board's (Finance Board) priorities and plans do change periodically. Consequently, this Strategic Plan is updated each year to incorporate the Finance Board's most current strategic plan. At the issuance of OIG's Strategic Plan for the Period April 1, 2004 – March 31, 2009, the Finance Board's strategic plan had been approved by the Board of Directors and was considered in the development of OIG's strategic plan.

#### **AUTHORITY AND JURISDICTION OF THE OIG**

The OIG was established in October 1989, concurrent with the creation of the Finance Board, by the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA). FIRREA specifically provides for the establishment of OIG at the Finance Board. In addition, OIG receives guidance on conducting audit and investigative work from the Office of Management and Budget (OMB), the President's Council on Integrity and Efficiency (PCIE), and the Executive Council on Integrity and Efficiency (ECIE).

The authority of the Finance Board's Inspector General is derived from the IG Act and FIRREA. The Inspector General's authority to conduct audits and investigations is limited to Finance Board programs and activities. He/she is not the Inspector General for the Federal Home Loan Bank (FHLBank) System. However, when audits or investigations involving Finance Board programs and/or activities also involve the FHLBanks or other entities, it may be necessary for the Inspector General to conduct audit or investigative work at these entities.

The IG Act sets out certain major duties and responsibilities of the Inspector General that are intended to facilitate the economic, efficient, and effective conduct of Finance Board activities. The Act also provides the Inspector General with tools to prevent and detect fraud and abuse in these activities. Specifically the IG is mandated to:

- provide policy direction for the conduct, supervision, and coordination of both audits and investigations relating to the programs and operations of the Finance Board;
- provide leadership and coordination and recommend policies and procedures to promote agency economy, efficiency, and effectiveness in its operations;
- review existing and proposed legislation and regulations;

- recommend policies for coordination between the Finance Board and other federal, state, and local government agencies and non-government entities;
- keep the Chairman, the Board, agency managers, and the Congress fully and currently informed of significant developments under the jurisdiction of the IG. Recommend to these officials corrective actions and report on the progress made in implementing corrective actions; and
- submit semiannual reports to the Congress, through the Chairman, summarizing the activities of the OIG during the preceding period.

The IG Act authorizes the Inspector General to: (1) access all records, reports, audits, reviews, documents, papers, recommendations, or other material available to the Finance Board which relate to programs and operations of the agency; (2) conduct such investigations and issue reports as are, in the judgment of the Inspector General, necessary or desirable; (3) request information or assistance from any federal, state, or local government agency or unit, as may be necessary for carrying out his duties and responsibilities of the IG Act; (4) issue subpoenas; (5) administer and take oaths, affirmations or affidavits from any person, when necessary; (6) select, appoint and employ such officers and employees as may be necessary for carrying out the functions, powers, and duties of the OIG; (7) obtain temporary expert and consultant services; (8) have direct and prompt access to the Chairman, when necessary; (9) contract for audits, studies, analyses and other services within the limits of the established budget; and (10) receive in confidence and investigate complaints or information from Finance Board employees and other sources concerning possible violations of law, rules, or regulations, or mismanagement, gross waste of funds, or abuse of authority or a substantial and specific danger to the public health and safety by Finance Board officials.

In order to effectively use its resources and properly exercise its authorities in support of the agency's mission and OIG's responsibilities, OIG has established four goals. For each of these goals, OIG has also developed objectives, strategies and performance measures. The four goals are:

- ☐ Facilitate the Finance Board's mission and strategic goals by identifying, planning, and conducting audits designed to prevent and detect fraud, waste and abuse in Finance Board Programs,
- Conduct investigations to facilitate the proper disposition of allegations of possible criminal violations and possible administrative abuses involving Finance Board Employees and/or Programs,
- Facilitate the Finance Board's development of effective operations, policies, and procedures that address all agency responsibilities prescribed in applicable laws, regulations, and executive orders, and

# GOAL I

Facilitate the Finance Board's mission and strategic goals by identifying, planning, and conducting audits designed to prevent and detect fraud, waste and abuse in Finance Board programs

# **OBJECTIVE A**

Conduct audits that support the agency's goal to have the Finance Board's program of FHLBank supervision foster safe and sound operations at each of the Federal Home Loan Banks.



# Strategy

- Obtain and review the Finance Board's current strategic plan and current year's
  performance plan developed in accordance with the Government Performance and
  Results Act (GPRA) to determine the results the agency wants to achieve in the
  supervision of FHLBanks;
- 2. Obtain and review the Finance Board's prior year performance report to determine the results achieved to date in supervising the FHLBanks;
- Conduct interviews with all Board Members and office directors to obtain their input on the results the agency should be trying to achieve in the FHLBank supervision program;
- Review existing and proposed laws and regulations affecting the Finance Board to identify any audits required by these statutes and regulations that address the FHLBanks' supervision;
- 5. Review existing and proposed laws and regulations affecting the OIG to identify any audits required by these statutes and regulations that address the FHLBanks' supervision;
- 6. Maintain an OIG "HOTLINE" for the receipt of suggestions, information on possible violations of law and regulations in the FHLBanks' supervision program;
- 7. Review the results of the Office of Supervision's annual vulnerability assessment as it relates to FHLBank supervision;
- 8. Identify audit areas during the conduct of surveys, audits, and investigations that relate to FHLBank supervision;

- 9. Develop a list of potential audits involving FHLBank supervision based on the Finance Board's goals and objectives listed in the agency's strategic plan. (See Exhibit 1 for Audit Universe);
- 10. Select FHLBank supervision related audits to be performed over the next five years (See Exhibit 2 Five Year Audit Plan);
- 11. Identify audits related to FHLBank supervision to be included in OIG's annual audit plan (See Exhibit 3) based on OIG's prioritization of audits;
- 12. Liaison with the Congress and the Executive Council on Integrity and Efficiency in order to identify audits requested by the Congress that relate to FHLBank supervision; and
- 13. The Inspector General shall continue to meet monthly with the Chairman to discuss FHLBank supervision vulnerabilities and desired program results.

- 1. Audits are completed for areas that are the subject of concern by FHFB management, the Congress, OMB or other outside stakeholders identified in the Finance Board's strategic plan.
- 2. Audits are completed for areas related to FHLBank supervision, that OIG determined to be highly vulnerable to fraud, waste, and/or abuse.
- 3. Audits result in positive changes to FHLBank supervision or FHFB operations.

- A Finance Board approved strategic plan that clarifies the agency's goals and objectives related to FHLBank supervision.
- 2. Finance Board management willingness to maintain a positive working relationship with OIG.
- 3. Approval of the Inspector General's annual budget request.

# GOAL I

Facilitate the Finance Board's mission and strategic goals by identifying, planning, and conducting audits designed to prevent and detect fraud, waste and abuse in Finance Board programs

# **OBJECTIVE B**

Conduct audits that support the Finance Board's goal to ensure that the Federal Home Loan Banks serve the nation's housing finance and community investment needs.

# e Loan Banks

# <u>Strategy</u>

- Obtain and review the Finance Board's current strategic plan and current year's
  performance plan developed in accordance with the Government Performance
  and Results Act (GPRA) to determine the results the agency wants the FHLBanks to
  achieve in housing finance and community investment needs;
- 2. Obtain and review the Finance Board's prior year performance report to determine the results achieved to date by the FHLBanks in housing finance and community investment;
- Conduct interviews with all Board Members and office directors to obtain their input on the results the FHLBanks should be trying to achieve in housing finance and community investment:
- 4. Review existing and proposed laws and regulations affecting the Finance Board to identify any audits required by these statutes and regulations that address housing finance goals and community investment goals;
- 5. Review existing and proposed laws and regulations affecting the OIG to identify any audits required by these statutes and regulations that address the FHLBanks housing finance and community investment activities;
- Maintain an OIG "HOTLINE" for the receipt of suggestions, information on possible violations of law and regulations in the FHLBanks' housing finance and community investment program;
- 7. Review the results of the Office of Supervision's annual vulnerability assessment as it relates to FHLBanks' housing finance and community investment activities;
- 8. Identify audit areas during the conduct of surveys, audits, and investigations that relate to FHLBanks housing finance and community investment activities;

- 9. Develop a list of all potential audits of involving FHLBank housing finance and community investment activities based on the Finance Board's goals and objectives listed in the agency's strategic plan. (See Exhibit 1 for Audit Universe);
- 10. Select FHLBank housing finance and community investment related audits to be performed over the next five years (See Exhibit 2 Five Year Audit Plan); and
- 11. Identify audits related to FHLBank housing finance and community investment to be included in OIG's annual audit plan (Exhibit 3) based on OIG's prioritization of audits.

- Audits are completed for areas that are the subject of concern by FHFB management, the Congress, OMB or other outside stakeholders identified in the Finance Board's strategic plan.
- 2. Audits are completed for areas related to FHLBank housing finance and community investment activities that OIG determined to be highly vulnerable to fraud, waste, and/or abuse.
- 3. Audits result in positive changes to FHLBank supervision or FHFB operations.



- A Finance Board approved strategic plan that clarifies the agency's goals and objectives related to the FHLBanks serving the nation's housing finance and community investment needs.
- 2. Finance Board management willingness to maintain a positive working relationship with OIG.
- 3. Approval of the Inspector General's annual budget request.

# GOAL I

Facilitate the Finance Board's mission and strategic goals by identifying, planning, and conducting audits designed to prevent and detect fraud, waste and abuse in Finance Board programs

# **OBJECTIVE C**

Conduct audits that support the Finance Board's goal to ensure its supervisory, managerial, and legal resources support effective, efficient, and responsive FHLBank supervision, regulation, and housing mission oversight.

# Strategy

- Obtain and review the Finance Board's current strategic plan and current year's
  performance plan developed in accordance with the Government Performance and
  Results Act (GPRA) to determine the results the agency wants each Finance Board office
  to achieve:
- 2. Obtain and review the Finance Board's prior year performance report to determine the results achieved to date by each Finance Board office;
- Conduct interviews with all Finance Board Members and office directors to obtain their input on the results each Finance Board office should be trying to achieve;
- 4. Review existing and proposed laws and regulations affecting the Finance Board to identify any audits required by these statutes and regulations of Finance Board operations;
- 5. Review existing and proposed laws and regulations affecting the OIG to identify any audits required by these statutes and regulations that address Finance Board operations;
- 6. Maintain an OIG "HOTLINE" for the receipt of suggestions, information on possible violations of law and regulations, and information on possible fraud waste, or abuse in the Finance Board offices' operations;
- 7. Review the results of the Finance Board's annual vulnerability assessment as it relates to the Finance Board's supervisory, managerial, and legal resources supporting effective, efficient, and responsive FHLBank regulation and oversight;
- 8. Identify audit areas during the conduct of surveys, audits, and investigations that relate to Finance Board offices' operations;
- 9. Develop a list of potential audits involving Finance Board operations based on the Finance Board's goals and objectives listed in the agency's strategic plan. (See Exhibit 1 for Audit Universe);

- 10. Develop an OIG five year plan for audits that indicates which audits relate to the agency's strategic plan (Exhibit 2);
- 11. Identify audits related to Finance Board operations to be included in OIG's annual audit plan (Exhibit 3) based on OIG's prioritization of audits included in the audit Universe developed by OIG (Exhibit 1);
- 12. Liaison with the Congress, the Executive Council on Integrity and Efficiency(ECIE), and the President's Council on Integrity and Efficiency (PCIE) to identify audits requested by the Congress that relate to Finance Board operations; and
- 13. The Inspector General shall continue to meet monthly with the Chairman to discuss Finance Board offices' vulnerabilities and desired program results.

- 1. Audits are completed for areas that are the subject of concern by FHFB management, the Congress, OMB or other outside stakeholders identified in the Finance Board's strategic plan.
- 2. Audits are completed for areas related to the operations of Finance Board offices that OIG determined to be highly vulnerable to fraud, waste, and/or abuse.
- 3. Audits result in positive changes to FHFB operations.

- A Finance Board approved strategic plan that clarifies the agency's goals and objectives related to each Finance Board office.
- 2. Finance Board management willingness to maintain a positive working relationship with OIG.
- 3. Approval of the Inspector General's annual budget request.

# GOAL II

Conduct investigations to facilitate the proper disposition of allegations of possible criminal violations and possible administrative abuses involving Finance Board employees and/or programs

# **OBJECTIVE A**

Ensure the timely and proper referral of possible criminal violations to the Department of Justice.

# <u>Strategy</u>

- 1. To the extent practicable, conduct investigations using OIG staff. If our actual workload exceeds our projected workload during any particular year, the OIG will continue arranging for assistance from other Offices of Inspectors General to augment our investigative resources on a reimbursable or non-reimbursable basis;
- 2. Coordinate with management to ensure OIG is immediately notified of possible criminal violations;
- 3. Immediately notify the Department of Justice of all possible criminal violations involving the Finance Board for DOJ's decision on whether to initiate a criminal investigation. Closely coordinate with DOJ on any resulting investigations to ensure a quality investigation;
- 4. Based on information gathered during investigations, identify any audits needed to address control weaknesses contributing to the criminal act(s);
- Maintain a HOTLINE operation to ensure that those who may want to anonymously report wrongdoing in the Finance Board's programs and operations can do so. The local and tollfree HOTLINE numbers are published in the Finance Board's telephone directory;
- 6. Attend various investigation forums to remain current on new criminal schemes and investigative techniques;
- 7. Request and facilitate a peer review of OIG's investigation function every three years;
- 8. Provide on-going investigation related training to OIG staff;
- 9. Coordinate with the IGs' Council of Counsels on legal issues impacting investigative activities by the Inspectors General; and
- 10. Conduct criminal investigations in accordance with *Quality Standards for Investigations* issued by the PCIE/ECIE.

- 1. OIG identifies matters that represent possible criminal violations involving Finance Board operations;
- 2. Investigation reports require little if any additional investigative work after they are referred to the Department of Justice.
- 3. OIG referred cases are not dismissed due to investigative errors.
- 4. Information developed during the course of investigations is released only with DOJ and the Inspector General's approval.
- 5. Peer reviews of OIG's investigative function indicate the operation is performed in a quality manner.

- Finance Board management makes timely referrals of potential criminal investigative matters to OIG.
- 2. OIG has the flexibility to augment its budget to obtain investigative resources as needed.
- 3. OIG offices and equipment are configured to allow for the confidential handling of investigative matters.

# GOAL II

Conduct investigations to facilitate the proper disposition of allegations of possible criminal violations and possible administrative abuses involving Finance Board employees and/or programs

# **OBJECTIVE B**

Facilitate Finance Board management's administrative adjudication of matters involving possible administrative abuses by Finance Board employees or in the operation of Finance Board programs.

# **Strategy**

- 1. Review all allegations to identify possible administrative improprieties and immediately advise management;
- Coordinate with management to ensure OIG is immediately notified of possible administrative violations:
- 3. Based on information gathered during investigations, identify any audits needed to address control weaknesses contributing to the administrative impropriety;
- 4. Maintain a HOTLINE operation to ensure that those who may want to anonymously report wrongdoing in the Finance Board's programs and operations can do so. The local and toll-free HOTLINE numbers are published in the Finance Board's telephone directory;
- 5. Attend various investigation forums to remain current on new administrative schemes and investigative techniques;
- 6. Coordinate with the IGs' Council of Counsels on legal issues impacting investigative activities by the Inspectors General;
- 7. Conduct administrative investigations in accordance with *Quality Standards for Investigations* issued by the PCIE/ECIE;
- 8. Request a peer review of OIG's investigative function every three years; and
- 9. Provide training to all OIG staff on investigative techniques.

- 1. Administrative investigations are conducted in a manner that does not jeopardize the successful investigation and adjudication of criminal matters.
- 2. Administrative investigations are conducted in a manner that facilitates appropriate administrative actions.
- 3. Peer reviews of OIG's investigative function conclude that the operation is performed in a quality manner.
- 4. Information developed during the course of investigations is released only with the Inspector General's approval.

- strative investigative
- Finance Board management makes timely referrals of potential administrative investigative matters to OIG.
- 2. OIG has the flexibility to augment its budget to obtain investigative resources as needed.
- 3. OIG offices and equipment are configured to allow for the confidential handling of investigative matters.

# GOAL III

Facilitate the Finance Board's development of effective operations, policies, and procedures that address all agency responsibilities prescribed in applicable laws, regulations, and executive orders

# **OBJECTIVE A**

Identify and review laws and regulations that impact Finance Board programs and operations for the purpose of assuring all agency responsibilities are met and that such laws and regulations do not contribute to waste and abuse in Finance Board operations.

# <u>Strategy</u>

- 1. Coordinate with Finance Board management to keep informed of proposed laws and regulations impacting the Finance Board;
- 2. Review various data bases for laws and regulations that impact the Finance Board;
- 3. Provide feedback to Finance Board management where OIG reviews identify matters that could result in waste, fraud, or abuse;
- 4. The Inspector General will continue to meet monthly with the Chairman to address agency compliance with applicable laws and regulations;
- 5. OIG staff will continue to attend Board meetings, as appropriate, to keep abreast of laws and regulations impacting the Finance Board; and
- 6. The Inspector General will continue to meet monthly with the Inspectors General from all financial regulatory agencies.

# Performance Measures

- 1. OIG is familiar with all proposed legislation, regulations, policies and procedures that impact the Finance Board.
- 2. OIG's reviews of policies and procedures result in the accurate identification of material control weaknesses, management inefficiencies, and/or violations of laws and regulations.
- 3. Finance Board management or other stakeholders agree with the facts resulting from OIG's reviews.

- Management provides OIG with copies of all proposed laws and regulations affecting the Finance Board;
- 2. OIG has adequate legal resources to perform required reviews; and
- 3. Management is receptive to OIG observations and possible recommendations.

# GOAL III

Facilitate the Finance Board's development of effective operations, policies, and procedures that address all agency responsibilities prescribed in applicable laws, regulations, and executive orders

# **OBJECTIVE B**

Review existing and proposed Finance Board policies and procedures to assess the compliance with laws and regulations, their economy and efficiency and their susceptibility to

# **Strategy**

- 1. Review all internal policies and procedures issued by the Finance Board;
- 2. Coordinate with Finance Board management to obtain all proposed Finance Board rules, regulations, policies, and procedures;
- 3. Provide written comments to Finance Board management on new or proposed policies and procedures that pose unacceptable risk of inefficient, uneconomical operations or the potential for fraud, waste, and abuse;
- 4. The Inspector General will continue to meet monthly with the Chairman to address matters related to agency policies and procedures; and
- 5. OIG staff will continue to serve on Finance Board committees and task forces, as appropriate, to provide guidance on proper internal controls.

# **Performance Measures**

- 1. OIG is familiar with all proposed Finance Board policies and procedures.
- 2. OIG's reviews of policies and procedures result in the accurate identification of material control weaknesses and/or management inefficiencies.
- 3. Finance Board management or other stakeholders agree with the facts resulting from OIG's reviews.

- Key Factors 1. Management provides OIG with copies of all proposed Finance Board policies,
- 2. OIG has adequate legal resources to perform required reviews; and

and procedures;

3. Management is receptive to OIG observations and possible recommendations.

# GOAL IV

Educate Finance Board staff, the Congress, and others on the various duties and responsibilities of FHFB-OIG and FHFB-OIG operations while developing and maintaining positive working relationships

# **OBJECTIVE A**

Educate Finance Board staff at all levels, the Congress, and others on the various duties and responsibilities of FHFB-OIG.

# **Strategy**

- 1. OIG will participate in new employee orientation sessions for the purpose of clarifying OIG's role and alerting employees to issues identified by OIG;
- 2. OIG will establish a website to familiarize employees with OIG duties and responsibilities;
- 3. OIG will develop and distribute pamphlets and flyers on OIG's responsibilities and employee rights when interacting with OIG;
- 4. OIG will sponsor agency forums to improve agency interaction;
- 5. The Inspector General will meet regularly with the Chairman to brief him on OIG activities;
- 6. The Inspector General will meet with members of the Board, as the Inspector General deems appropriate, to brief them on OIG activities;
- 7. OIG will issue a semiannual report to the Congress on its audit and investigative activities at the Finance Board; and
- 8. The Inspector General will meet at least annually with Senate and House banking oversight committees' staff.

- 1. Finance Board staff are more familiar with OIG duties and responsibilities.
- 2. The number of employees identifying potential fraud, waste or abuse instances to OIG increases.
- 3. Contacts with the Congress and Finance Board staff indicate they understand FHFB-OIG operations.

- 1. Having information technology support for OIG's website;
- 2. Management support of OIG outreach efforts; and
- 3. The availability of the Finance Board Chairman and members of the Congress.



# **GOAL IV**

Educate Finance Board staff, the Congress, and others on the various duties and responsibilities of OIG and the daily operations of OIG

# **OBJECTIVE B**

Develop and maintain positive working relationships with Finance Board management, the Congress, OMB, and Finance Board staff.

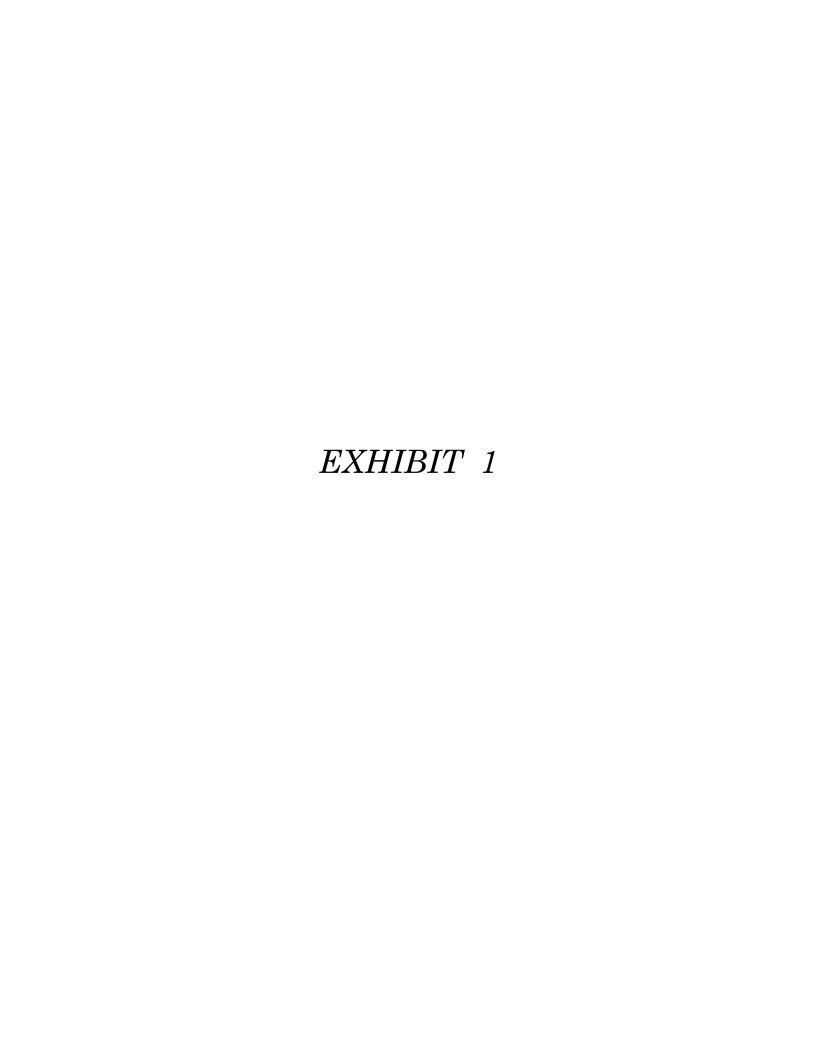
# <u>Strategy</u>

- 1. Establish a website to familiarize employees and non-employees with OIG duties and responsibilities;
- 2. Issue a semiannual report to the Congress, OMB, and Finance Board management on its audit and investigative activities at the Finance Board;
- Issue FHFB-OIG's five year strategic plan and annual audit plan;
- 4. Sponsor OIG activities and invite agency management and staff;
- 5. Support the development of an agency policy on coordinating with FHFB-OIG; and
- 6. OIG will maintain liaison with the Congress and OMB, as appropriate.

# Performance Measures

- 1. The number of inquiries made directly of OIG will increase.
- 2. More requests for OIG participation in agency projects.

- 1. Finance Board management support of the IG function in general; and
- 2. The availability of the Finance Board management and congressional staff.



	Proposed Audits	Last Audited	Objective(s) of Audits	Priority Scoring	Type Function
1	Audit of FHFB's Financial Statements (contract)	11/05	We have contracted with a certified public accounting firm to audit the Finance Board's Financial Statements annually. The audit will encompass a review of financial transactions, accounts, and reports, including an evaluation of compliance with significant financial laws, regulations, and policies of the Finance Board, and an evaluation of internal accounting control.	160	А
2	Audit of the Finance Board's compliance with the Federal Information Security Management Act (FISMA) (contract)	9/05	We will review the IT office's security measures for the agency to assess the agency's vulnerability to information loss or theft.	150	A
3	Audit of FHFB compliance with Section 522 of the Consolidated Appropriations Act of 2005 (Privacy safeguards) (contract)		We will contract with a firm with experience in conducting privacy reviews. The objectives of the audit will be to (a) assess the agency's use of information in an identifiable form, (b) evaluate the privacy and data protection procedures of the agency, and (c) recommend strategies and specific steps to improve privacy and data protection management.	140	Р
4	Limited Review of the FHFB's implementation of OMB Circular A-123	11/05	To comply with requirements of OMB Circular A-123, the Finance Board is required to annually assess and report on the overall adequacy and effectiveness of management controls within the agency. We will conduct a limited review of the process used to assess the agency's internal control system.	135	A
5	Survey of OGC	11/92	We will review the various regulations, policies, and procedures which outline the various responsibilities of OGC and will review OGC operations to determine whether adequate controls exist to meet their various responsibilities.	125	Р
6	Audit of the Finance Board's Compensation policies and procedures (contract)	_	We will conduct a compliance audit to assess compliance of agency compensation policies and procedures with applicable OPM regulations.	125	А
7	Audit of the Effectiveness of Examiner Recruitment, Selection, and retention		We will review this area to determine whether adequate steps have been taken to recruit qualified and diverse candidates for examiner positions; whether the selection process was adequately competitive; and what efforts are made to retain quality examiners.	120	Р
8	Audit of the Thoroughness of Examinations in identifying safety and soundness issues	9/98 (GAO)	We will conduct an operational audit to determine how the scope of examinations is determined and whether the method of scoping examinations has resulted in the early identification and resolution of safety and soundness issues.	120	Р
9	Review of Finance Board's Performance Report on progress toward accomplishing the agency's Strategic Plan performance measures		We will annually review the Finance Board's performance report to assess how well the agency did in meeting its various performance goals.	115	Р
10	Audit of Adequacy of Physical Security over Agency Assets (contract)	4/01	We will conduct an audit of the effectiveness of agency policies and procedures for safeguarding agency assets.	115	Р
11	Audit of the Effectiveness of FHFB's Records Management Function (contract)		We will conduct an audit of the effectiveness of policies and procedures for managing Finance Board records.	110	А
12	Survey of the Information Technology Program (Contract)	5/96	We will conduct a survey of the operations and internal controls within the Information Technology Division. Based on the results of the review, we will determine whether any areas will be scheduled to receive more detailed audit coverage	110	Р
13	Audit of Effectiveness of IT Function in Meeting Needs of Finance Board Offices (contract)		We will assess the effectiveness of the IT function in responding to the needs of various Finance Board offices to identify any areas which need improvement.	110	А
14	Performance Audit - FHFB's Contracting for Services	11/03	We will review the Finance Board's policies and procedures for contracting, assess whether our procedures deviate from federal regulations and why, and review controls over the cost of service contracts.	110	А

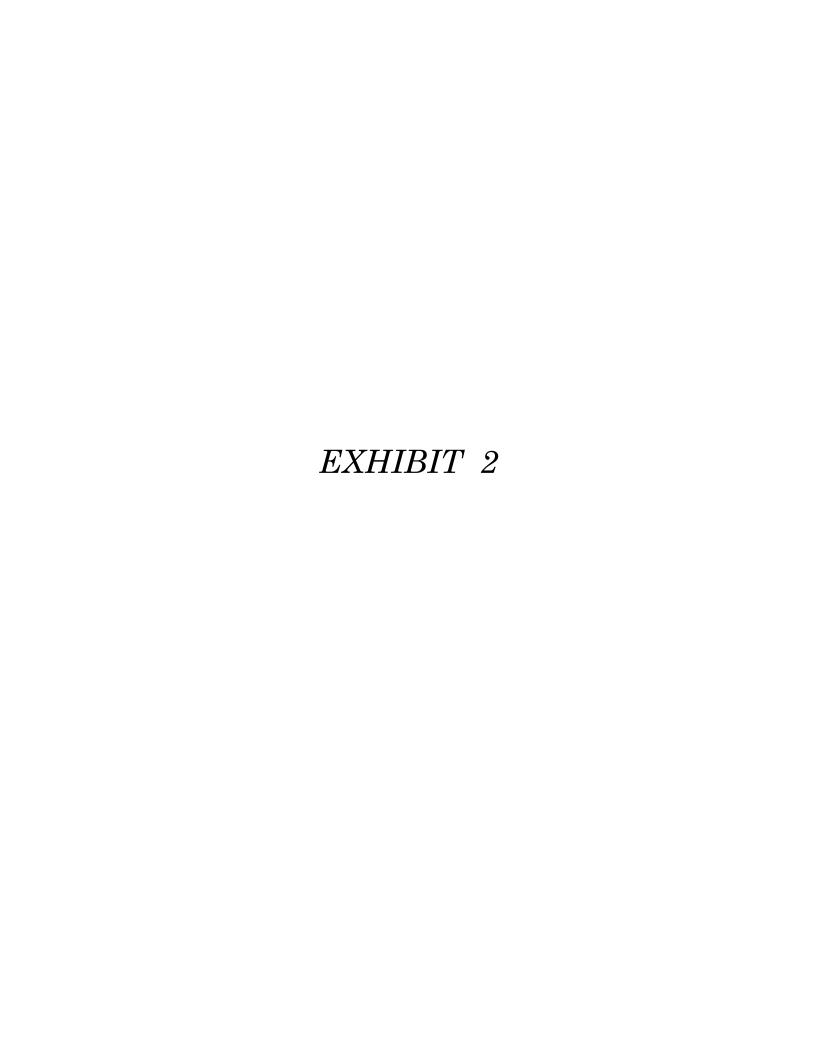
New Will conduct a survey of Human Resources Function (Emphasis on Merit Pay and Hinnig)   New Will conduct a survey of the operations and internal controls within the Human Resource Division, with an emphasis on implementation of the merit pay system. Based on the results of the review, we will determine whether any areas will be scheduled to [10]   A		Proposed Audits	Last Audited	Objective(s) of Audits	Priority Scoring	Type Function
Improces implementation of the ment tipay system. Based on the results of the review, we will determine whether any areas will be scheduled to Indicate the cockey of ecceive more detailed audit coverage.  In a valid of the Timeliness of Examinations  495  We will an additional programs and assess the examination adhibits compliance with the law and the ability of the examination office to respond to unscheduled and the program compare the training plan with other examiner. Training programs and assess the extent to which examiners have recorded planned training.  Program  We will conduct an excorrony and efficiency audit of the budgeting for IT Equipment and Software (confact).  We will conduct an excorrony and efficiency audit of the budgeting process for IT equipment. We will review the process for identifying the IT needs.  We will conduct an excorrony and efficiency audit of the budgeting process for IT equipment. We will review the process for identifying the IT needs.  We will conduct an excorrony and efficiency audit of the budgeting process for IT equipment. We will review the process for identifying the IT needs.  We will conduct an excorrony and efficiency audit of the budgeting process for IT equipment. We will review the process for identifying the IT needs.  We will conduct an excorrony and efficiency audit of the budgeting process for IT equipment. We will review the process for identifying the IT needs.  We will conduct an excorrony and efficiency with which examines have recorded planned training.  We will conduct a compliance whether enforcement tools were used when appropriate.  We will conduct a compliance audit of the controls were used when appropriate.  We will conduct an examination for indicate the examination to ensure the implementation.  We will conduct an examination for indicate the examination to ensure the extent to which corrective actions on audit recommendations have been taken.  We will conduct an audit of the economy and efficiency with which the Finance Board disposes of IT						
Audit of the Effectiveness of the Examiner Training Programs and assess the extent to which examiner training programs compare the training plan with other examiner Training Programs and assess the extent to which examiners have received planned training and which other examiner training programs; and assess the extent to which examiners have received planned training.    Audit of Budgeting for IT Equipment and Software (contract)   We will review the process for identifying the IT needs of the Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of the Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of the Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of Finance Board and controls over how the agency plans to satisfy its IT needs.   The extension of Finance Board procedures governing the agency's use of enforcement tools to ensure the implementation of Finance Board procedures governing the agency's use of enforcement tools to ensure the implementation of Finance Board procedures governing the agency's use of enforcement tools to ensure the implementation of finance Board procedures governing the agency's use of enforcement tools to ensure the implementation of Finance Board procedures governing the agency's use of enforcement tools to ensure the implementation of finance Board sources, to determine whether adequate risk based capital policies and the controls that will be in place to ensure the FFILBanks implementation.    **Audit of FHFB's Process for establishing and monitoring conciliations	15		In-process	implementation of the merit pay system. Based on the results of the review, we will determine whether any areas will be scheduled to	110	А
training programs and assess the extent to which examiners have received planned training.  Audit of Budgeting for IT Equipment and Software (contract)  We will conduct an economy and efficiency audit of the budgeting process for IT equipment. We will review the process for Identifying the IT needs of the Finance Board and controls over how the agency plans to salisty its IT needs.  Part Audit of the Adequacy of Enforcement Tools to ensure Responsiveness to Examination Findings and and there sources, to determine whether enforcement tools were used when appropriate.  We will conduct a compliance audit of the controls over payroll transactions to ensure compliance with applicable standards and federal directives.  We will review the Finance Board's process for ensuring the FHLBanks have adequate risk based capital policies and the controls that compliance with Risk Based Capital Pegulations (contractor)  We will review the Finance Board managers to determine the extent to which corrective actions on audit recommendations have been taken.  We will follow-up with Finance Board managers to determine the extent to which corrective actions on audit recommendations have been taken.  New Will conduct an audit of the economy and efficiency with which the Finance Board disposes of IT equipment and the agency's adherence to applicable laws and regulations.  In process adherence to applicable laws and regulations.  New will review the Finance Board's criteria for assessing mission achievement by the FHLBanks and review what examination criteria is met by the	16	Audit of the Timeliness of Examinations	4/95		110	Р
Contract)   7/96   the IT needs of the Finance Board and controls over how the agency plans to salisfy its IT needs.   105   A	17	ů .			105	Р
Responsiveness to Examination Findings and Recommendations of Jecchine We will review various matters resulting from examination findings and other sources, to determine whether enforcement tools were used when appropriate.  20 Audit of FHFB's Payroll (contract)  4/03  We will conduct a compliance audit of the controls over payroll transactions to ensure compliance with applicable standards and federal directives.  4/03  We will conduct a compliance audit of the controls over payroll transactions to ensure compliance with applicable standards and federal directives.  4/03  We will review the Finance Board's process for ensuring the FHLBanks have adequate risk based capital policies and the controls that will be in place to ensure the FHLBanks' implementation.  4/04  We will follow-up with Finance Board managers to determine the extent to which corrective actions on audit recommendations have been taken.  4/05  We will conduct an audit of the economy and efficiency with which the Finance Board disposes of IT equipment and the agency's adherence to applicable laws and regulations.  4/05  Audit of the facilities management function  We will conduct an audit of the facilities management function to determine whether adequate procedures exist to ensure the proper management of agency facilities and equipment.  We will review the Finance Board's process for ensuring the FHLBanks and review what examination criteria is used to assess mission achievement.	18	0 0 1 1	7/96		105	A
Audit of FHFB's Process for establishing and monitoring compliance with Risk Based Capital Regulations (contractor)  We will review the Finance Board's process for ensuring the FHLBanks have adequate risk based capital policies and the controls that will be in place to ensure the FHLBanks' implementation.  Percentage of Follow-up on Prior Audits  We will follow-up with Finance Board managers to determine the extent to which corrective actions on audit recommendations have been taken.  We will conduct an audit of the economy and efficiency with which the Finance Board disposes of IT equipment and the agency's adherence to applicable laws and regulations.  Audit of the facilities management function  We will conduct an audit of the facilities management function to determine whether adequate procedures exist to ensure the proper management of agency facilities and equipment.  We will eview the Finance Board's criteria for assessing mission achievement by the FHLBanks and review what examination criteria is used to assess mission achievement.	19	Responsiveness to Examination Findings and	9/98 (GAO)	implementation of Finance Board recommendations or directives. We will review various matters resulting from examination findings	105	Р
compliance with Risk Based Capital Regulations (contractor)    100   P	20	Audit of FHFB's Payroll (contract)	4/03		105	A
Audit of the Disposition of IT Equipment (contract)  Ne will conduct an audit of the economy and efficiency with which the Finance Board disposes of IT equipment and the agency's adherence to applicable laws and regulations.  Ne will conduct an audit of the facilities management function to determine whether adequate procedures exist to ensure the proper management of agency facilities and equipment.  Ne will conduct an audit of the facilities management function to determine whether adequate procedures exist to ensure the proper management of agency facilities and equipment.  Ne will review the Finance Board's criteria for assessing mission achievement by the FHLBanks and review what examination criteria is used to assess mission achievement.	21	compliance with Risk Based Capital Regulations			100	P
Audit of the facilities management function  We will conduct an audit of the facilities management function to determine whether adequate procedures exist to ensure the proper management of agency facilities and equipment.  We will review the Finance Board's criteria for assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the	22	Follow-up on Prior Audits		·	100	A
management of agency facilities and equipment. 100 A  25 Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the  26 Examination in ensuring that criteria is met by the  27 Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and review what examination criteria is used to assess mission achievement.	23	Audit of the Disposition of IT Equipment (contract)	In-process		100	A
Achievement by the FHLBanks and the effectiveness of is used to assess mission achievement.  examination in ensuring that criteria is met by the	24	Audit of the facilities management function			100	A
PHLBAIKS.	25	Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the				
		FHLBANKS.			100	P

	Proposed Audits	Last Audited	Objective(s) of Audits	Priority Scoring	Type Function
26	Audit of Effectiveness of Processing Issues thru the Finance Board (contract)	11/95	We will conduct an audit to assess the effectiveness of agency controls for ensuring the timely and consistent sharing of issues requiring Board members input.	100	Р
27	Audit of the Effectiveness of FHFB's Oversight of FHLBank Directors' Elections and Appointments	6/93	We will review the controls in place to ensure that Director elections are performed in accordance with Finance Board regulations and that Directors are appointed in accordance with FIRREA.	100	Р
28	Audit of the Effectiveness of FHFB's Monitoring of new business activities.		We will review the Finance Board's policies and procedures for monitoring FHLBank pilot projects. We will determine whether the Finance Board has adequate controls in place to assure the monitoring occurs and the results of the monitoring are used to take appropriate actions.	100	Р
29	Audit of the quality of guidance for examiners	In-process	We will assess the quality of guidance provided to examiners to assist them in the conduct of examinations.	100	P
30	Audit of the Effectiveness of examinations in assessing Dealers' compliance with underwriting agreement		We will review the examination procedures for determining whether dealers sell consolidated obligations in accordance with the master underwriting agreement.	95	Р
31	FHFB's use of Contract Legal Services	2/93	We will review the Finance Board's use of contract legal services to assess the controls over the quality of products received and the accuracy of bills and payments.	95	Р
32	Compliance Audit of the Finance Board's Ethics Program		We will review the adequacy of the policies and procedures related to the Ethics Program and assess the agency's compliance.	95	Р
33	Audit of Finance Board's promotion and retention process		We will assess the effectiveness of the Finance Board's program to promote and retain staff.	95	А
34	Survey of FHFB's Procedures For Dissemination of Information and Soliciting Input From External Sources		We will review the Finance Board's policies and procedures for obtaining comments on proposed rules and regulations and the policies and procedures for dissemination new Finance Board rules and regulations to entities affected to ensure adequate Finance Board feedback.	95	Р
35	Audit of Effectiveness of Process for Performing Personnel Security Clearances (contract)		We will review the Finance Board's policies and procedures for performing personnel security clearances and assess the agency's compliance.	95	А
36	Audit of Finance Board Implementation of a Telecommuting Program (contract)		We will conduct an audit to determine whether the Finance Boards telecommuting policies and procedures comply with applicable OPM regulations and to identify possible telecommuting opportunities at the Finance Board.	95	А
37	Audit of the Finance Board's Training Program		We will conduct an audit to review the effectiveness of FHFB's identifying, planning, and funding staff training needs	95	А
38	Audit of the Effectiveness of examinations in assessing Community Investment Programs' implementation	6/93	We will review the CIP program to determine its goals and objectives and to assess the effectiveness of examinations in determining FHLBanks' success in meeting established goals and objectives.	90	Р
39	Audit of the Adequacy of FHFB's AHP Regulations	6/93 (GAO)	We will review the various regulations, policies, and procedures which outline the various goals for AHP and obtain feedback on whether program goals are being met.	90	Р
40	Audit of the effectiveness of examinations in assessing FHLBanks' AMA products compliance with FHFB		We will review completed examinations to determine the level of work directed at assessing the propriety of FHLBanks' AMA products	0.5	
	regulations.			90	Р

	Proposed Audits	Last Audited	Objective(s) of Audits	Priority Scoring	Type Function
41	Audit of the adequacy of the design of the AHP database to effectively meet end user needs		We will assess end users satisfaction with the AHP database in order to identify possible needed enhancements.	90	Р
42	Audit of the confidentiality, integrity, and availability of data in AHP database		We will assess the examination procedures used to ensure the integrity of AHP data provided by the FHLBanks.	90	Р
43	Compliance Audit - Out of Town Travel Expenses (contract)	6/00	We will conduct an audit of policies, procedures, and practices related to out of town travel activities. Our objectives are: (a) to determine whether adequate controls exist to prevent and/or identify improper payments for airline tickets, invitational travel, and relocation travel; and (b) to assess the controls over employee travel funded by non-federal sources, combined personal and business travel, and the use of blanket travel authorizations.	90	A
44	Economy/Efficiency and Security Audit FHFB's Mailing/Shipping Costs (contract)	3/99	We will conduct an economy and efficiency audit of Finance Board expenditures for mailing and shipping. We will determine whether costs for these services are reasonable and whether existing policies and procedures adequately protect the agency against waste, fraud, and abusive use.	90	A
45	Audit of Effectiveness of Handling Confidential Documents in FHFB		We will conduct an audit of the effectiveness of agency policies and procedures for ensuring that the confidentiality of documents is maintained by the Finance Board.	90	Р
46	Audit of Supervision's Oversight of FHLBank Internal Audit Function	5/92	We will review the Finance Board policies related to the FHLBanks internal audit function and assess the Finance Board's use of these offices to achieve its regulatory responsibilities.	85	Р
47	Audit of FHFB's Cash Receipts (contract)	9/97	We will conduct an economy and efficiency audit to assess controls over processing cash received by the Finance Board.	80	А
48	Audit of FHFB's Maintenance and Disposition of non-IT FF&E (contract)	6/94	We will conduct an audit of the economy and efficiency with which the Finance Board is managing the maintenance and disposition of its FF&E.	80	А
49	Audit of FHFB's process for monitoring the Office of Finance's Debt Issuances		We will review the Finance Board's policies and regulations related to the FHLBanks' debt issuances and assess the controls in place to assure Office of Finance and FHLBanks compliance.	75	Р
50	Audit of the Adequacy of Community Support Program Regulations and Program Results	6/93	We will review the regulations related to the Community Support Program and assess Finance Board controls for ensuring the program's success.	75	Р

	Proposed Audits	Last Audited	Objective(s) of Audits	Priority Scoring	Type Function
51	Audit of the Process for Developing FHFB's Strategic Plan		We will conduct a compliance review of the process used to develop agency performance measures. The scope will include assessing whether current performance measures appear adequate to determine progress towards meeting the objectives of the Finance Board's strategic plan.	75	Р
52	Audit of FHFB's Effectiveness in Identifying and Tracking FHFB's related Legislative Issues		We will review Finance Board policies and procedures designed to identify and track legislative issues impacting the Finance Board to ensure that the Finance Board is properly advised.	75	Р
53	Audit of FHFB's Accounts Payable (contract)	4/03	We will conduct a compliance audit of the controls over transactions in accounts payable accounts are made in accordance with applicable standards and federal directives.	75	А
54	Survey of FHFB's EEO Function (contract)		We will conduct a survey of the EEO program. Based on the results, we will determine whether any areas will be scheduled to receive more detailed audit coverage.	75	Р
55	Audit of the Controls Over FHFB's Centrally Billed Procurement Credit Card Accounts (contract)		We will conduct an audit to determine whether purchases charged to centrally billed credit cards comply with applicable procurement regulations and internal policies and procedures.	75	А
56	Audit of the Controls Over FHFB's Centrally Billed Travel Credit Card Account (contract)	3/95	We will conduct a economy and efficiency audit to determine whether charges to the Finance Board's centrally billed travel credit card account are properly supported.	75	А
57	Compliance Audit - Use of Individually Assigned Government Credit Cards (contract)	5/02	We will conduct a compliance audit to determine whether Finance Board credit cards issued to individual staff members are used in accordance with applicable policies and procedures.	75	А
58	Audit of OS's Call Reporting System (CRS) data integrity.		We will assess whether the data in-put and out-put is accurate and reliable.	75	А
59	Compliance Audit - FHFB Lease Agreement with Bldg. Mgmt. (contract)		We will conduct a compliance audit of controls over costs associated with the building lease. We will determine whether rental expenditures are cost effective and have been made in accordance with the terms of the lease and applicable federal regulations.	70	A
60	Audit of the effectiveness and compliance of FHFB's incentive awards program		We will conduct an audit to assess the effectiveness of the process for granting incentive awards to staff and the program's compliance with OPM regulations and internal policies and procedures.	70	A
61	Audit of FHFB's Cash Management and Budget Process (contract)		We will conduct an economy and efficiency audit of cash management and budget policies. We will determine whether controls exist to ensure that the cash needs of the agency are effectively planned and cash received by the agency is properly budgeted and managed.	65	A
62	Audit of the Effectiveness of Examiner Coordination with Other Financial Regulatory Agencies		We will identify areas of needed coordination between the Finance Board and other financial regulatory agencies; the policies and procedures in place to facilitate such coordination, and we will assess the extent to which such coordination occurs.	65	Р
63	Audit of FHFB's Accounts Receivable (contract)	2/01	We will conduct a compliance audit of the controls over transactions in the accounts receivable accounts to ensure compliance with applicable standards and federal directives.	65	А
64	Audit of Local Travel policies and Expenses (contract)	6/00	We will conduct an economy and efficiency audit of the policies, procedures, and practices related to local travel. We will determine the extent to which travel activities are cost effective, and performed in accordance with the Finance Board's policies and procedures. The focus of the review will be on local travel activities by senior officials of the agency, and will include such areas as the use of vehicles, and meal expenses paid for employees in non-travel status.	65	A
		6/00	and meal expenses paid for employees in non-travel status.	65	

	Proposed Audits	Last Audited	Objective(s) of Audits	Priority Scoring	Type Function
65	Audit of FHFB's policies and procedures for the purchase of FF&E (contract)	6/93	We will conduct a performance audit to assess the effectiveness of controls over agency purchases of FF&E.	65	A
66	Audit of the Finance Board's Personnel Records Management Function (contract)		We will review controls over the handling of personnel records to assess compliance with applicable regulations and internal policies and procedures.	60	А
67	Audit of Budgeting for non-IT Equipment		We will conduct an economy and efficiency audit of the budgeting process for non-IT equipment. We will review the process for identifying equipment needs of the Finance Board and controls over how the agency plans to satisfy its non-IT equipment needs.	60	A
68	Performance Audit - Parking Program	4/98	We will conduct a performance audit to determine whether adequate controls exist to effectively manage the parking program.	60	А
69	Audit of Finance Board Grievance process		We will conduct an audit of the effectiveness of the Finance Board's process for resolving grievances.	60	Р
70	Audit of FHFB's Process for Facilitating the Sharing of Best Practices by the FHLBanks		We will assess the Finance Board's policies and procedures related to the FHLBanks' sharing of best practices in order to facilitate the accomplishment of their mission.	60	P
71	Audit of the security of the AHP database		We will conduct an audit to assess the adequacy of security measures for the AHP system and database.	50	Р
72	Audit of the Expenditures from Receptions & Representation Fund (contract)	6/02	We will review the transactions in the Reception and Representation Account to assess compliance with applicable laws and accuracy of charges.	50	А
73	Terminated/Ratified FHFB Contracts over \$2,500		We will audit all terminated contracts during the fiscal year to assess whether the Finance Board received services and/or goods consistent with the amounts paid to contractors.	45 _	А
74	Audit of the usefulness of information published by OS's Bank Analysis Division		We will identify users of information published by the Bank Analysis Division and assess the usefulness of the information to the users.	45	P
75	Performance Audit - FHFB's Lease Agreements for FF&E and Other Goods (contract)	6/93	We will conduct an audit of the controls over lease agreements for FF&E and other goods to assess how well the Finance Board is managing these leases.	40	А
76	Peer Review of Other Offices of Inspector General	12/03	As part of our reciprocal commitment to the ECIE and to facilitate compliance with the IG Act, we will conduct peer reviews of other OIG audit functions.	30	Р



	Proposed Audits	Last Audited	Priority Scoring	Type Function	FREQUENCY	Staff Days	4/1/06-3/31/07	4/1/07-3/31/08	4/1/08-3/31/09	4/1/09-3/31/10	4/1/10-3/31/11
1	Audit of FHFB's Financial Statements (contract)	11/05	160	А	Annually	100	100	100	100	100	100
2	Audit of the Finance Board's compliance with the Federal Information Security Management Act (FISMA) (contract)	9/05	150	A	Annually	120	120	120	120	120	120
3	Audit of FHFB compliance with Section 522 of the Consolidated appropriations Act of 2005 (Privacy safeguards) (contract)		140	A	Biannually	100	100		100		100
4	Limited Review of the FHFB's implementation of OMB Circular A-123 (Contract)	11/05	135	A	Annually	20	20	20	20	20	20
5	Survey of OGC	11/92	125	Р	One time	40		40			
6	Audit of the Finance Board's Compensation policies and procedures (contract)		125	А	Every 5 years	40		40			
7	Audit of the Effectiveness of Examiner Recruitment, Selection, and retention		120	Р	Every 5 years	120	120				
8	Audit of the Thoroughness of Examinations in identifying safety and soundness issues (Contract)	9/98 (GAO)	120	Р	Every 5 years	180	180				
9	Review of Finance Board's Performance Report on progress toward accomplishing the agency's Strategic Plan performance measures		115	Р	Every 2 years	40		40		40	
10	Audit of Adequacy of Physical Security over Agency Assets (contract)	4/01	115	Р	Every 3 years	40		40			40
11	Audit of the Effectiveness of FHFB's Records Management Function (contract)		110	A	Every 5 years	100	100				
12	Survey of the Information Technology Program (Contract)	5/96	110	Р	Every 5 years	100		100			

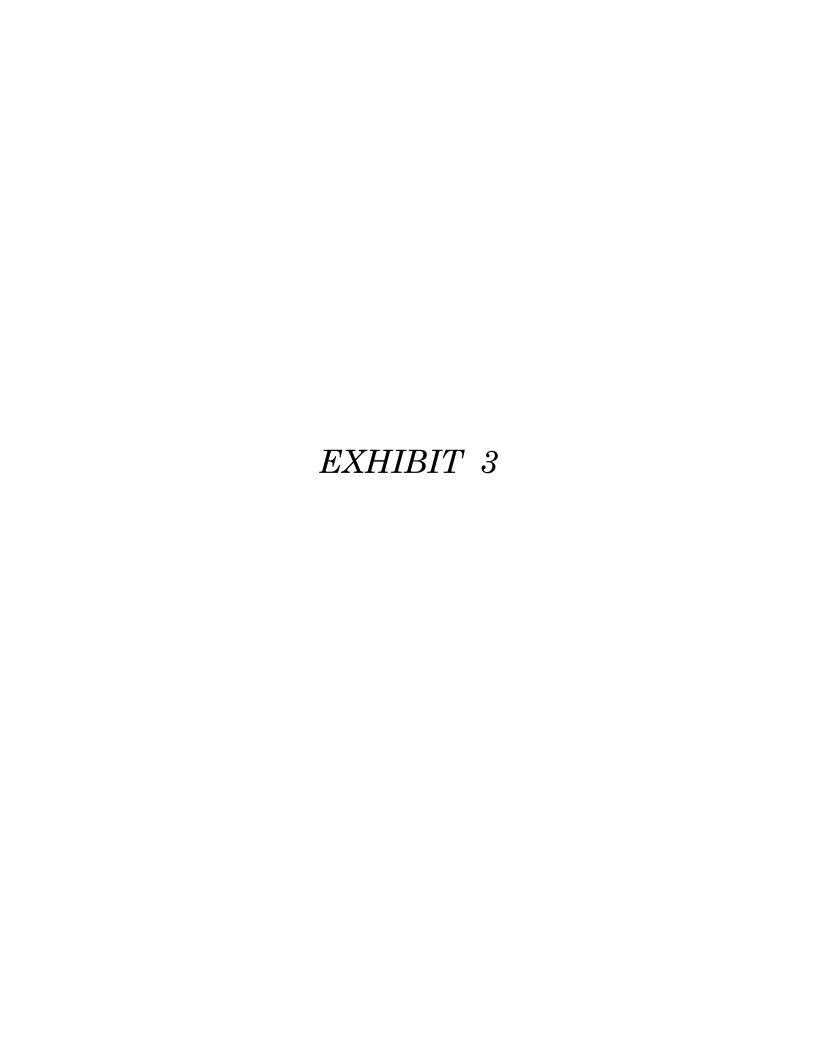
Proposed Audits	Last Audited	Priority Scoring	Type Function	FREQUENCY	Staff Days	4/1/06-3/31/07	4/1/07-3/31/08	4/1/08-3/31/09	4/1/09-3/31/10	4/1/10-3/31/11
Audit of Effectiveness of IT Function in Meeting Needs of Finance Board Offices (contract)		110	А	Every 3 years	40		40			40
Performance Audit - FHFB's Contracting for Services	11/03	110	A	Every 5 years	100	_			_	100
Survey of Human Resources Function (Emphasis on Merit Pay)	In-process	110	A	One time	40	40				
Audit of the Timeliness of Examinations	4/95	110	Р	Every 5 years	60		60			
Audit of the Effectiveness of the Examiner Training Program	_	105	Р	Every 5 years	40	_	40	_	_	
Audit of Budgeting for IT Equipment and Software (contract)	7/96	105	A	Every 5 years	60				60	
Audit of the Adequacy of Enforcement Tools to ensure Responsiveness to Examination Findings and Recommendations	9/98 (GAO)	105	Р	One time	80		80			
Audit of FHFB's Payroll (contract)	4/03	105	А	Annually	2	2	2	2	2	2
Audit of FHFB's Process for establishing and monitoring compliance with Risk Based Capital Regulations (contractor)		100	Р	One time	120		120			
Follow-up on Prior Audits		100	А	Annually	20	20	20	20	20	20
Audit of the Disposition of IT Equipment (contract)	In-process	100	А	Every 3 years	40	40			40	
Audit of the facilities management function		100	А	Every 5 years	40				40	
Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the FHLBanks.		100	Р	One time	100			100		
	Finance Board Offices (contract)  Performance Audit - FHFB's Contracting for Services  Survey of Human Resources Function (Emphasis on Merit Pay)  Audit of the Timeliness of Examinations  Audit of the Effectiveness of the Examiner Training Program  Audit of Budgeting for IT Equipment and Software (contract)  Audit of the Adequacy of Enforcement Tools to ensure Responsiveness to Examination Findings and Recommendations  Audit of FHFB's Payroll (contract)  Audit of FHFB's Process for establishing and monitoring compliance with Risk Based Capital Regulations (contractor)  Follow-up on Prior Audits  Audit of the Disposition of IT Equipment (contract)  Audit of the facilities management function  Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the	Performance Audit - FHFB's Contracting for Services  11/03  Survey of Human Resources Function (Emphasis on Merit Pay)  Audit of the Timeliness of Examinations  Audit of the Effectiveness of the Examiner Training Program  Audit of Budgeting for IT Equipment and Software (contract)  Audit of the Adequacy of Enforcement Tools to ensure Responsiveness to Examination Findings and Recommendations  Audit of FHFB's Payroll (contract)  Audit of FHFB's Process for establishing and monitoring compliance with Risk Based Capital Regulations (contractor)  Follow-up on Prior Audits  Audit of the Disposition of IT Equipment (contract)  In-process  Audit of the facilities management function  Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the	Audit of Effectiveness of IT Function in Meeting Needs of Finance Board Offices (contract)  Performance Audit - FHFB's Contracting for Services  11/03 110  Survey of Human Resources Function (Emphasis on Merit Pay) In-process 110  Audit of the Timeliness of Examinations 4/95 110  Audit of the Effectiveness of the Examiner Training Program 105  Audit of Budgeting for IT Equipment and Software (contract) 7/96 105  Audit of the Adequacy of Enforcement Tools to ensure Responsiveness to Examination Findings and Recommendations 9/98 (GAO) 105  Audit of FHFB's Payroll (contract) 4/03 105  Audit of FHFB's Process for establishing and monitoring compliance with Risk Based Capital Regulations (contractor) 100  Follow-up on Prior Audits 100  Audit of the Disposition of IT Equipment (contract) In-process 100  Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the	Audit of Effectiveness of IT Function in Meeting Needs of Finance Board Offices (contract)  Performance Audit - FHFB's Contracting for Services  11/03  110  A  Survey of Human Resources Function (Emphasis on Merit Pay)  In-process  110  A  Audit of the Timeliness of Examinations  4/95  110  P  Audit of the Effectiveness of the Examiner Training Program  105  P  Audit of Budgeting for IT Equipment and Software (contract)  Audit of the Adequacy of Enforcement Tools to ensure Responsiveness to Examination Findings and Recommendations  9/98 (GAO)  105  A  Audit of FHFB's Payroll (contract)  4/03  105  A  Audit of FHFB's Process for establishing and monitoring compliance with Risk Based Capital Regulations (contractor)  Follow-up on Prior Audits  Audit of the Disposition of IT Equipment (contract)  In-process  100  A  Audit of the Disposition of IT Equipment (contract)  In-process  100  A  Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the	Audit of Effectiveness of IT Function in Meeting Needs of Finance Board Offices (contract)  Performance Audit - 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FHFB's Contracting for Services  11/03 110 A Every 5 years 100  Survey of Human Resources Function (Emphasis on Merit Pay)  In-process 110 A One time 40  Audit of the Timeliness of Examinations 4/95 110 P Every 5 years 60  Audit of the Effectiveness of the Examiner Training Program 105 P Every 5 years 40  Audit of Budgeting for IT Equipment and Software (contract) 7/96 105 A Every 5 years 60  Audit of the Adequacy of Enforcement Tools to ensure Responsiveness to Examination Findings and Recommendations 9/98 (GAO) 105 P One time 80  Audit of FHFB's Payroll (contract) 4/03 105 A Annually 2  Audit of FHFB's Payroll (contract) 100 P One time 120  Audit of FHFB's Process for establishing and monitoring compliance with Risk Based Capital Regulations (contractor) 100 P One time 120  Audit of the Disposition of IT Equipment (contract) In-process 100 A Every 3 years 40  Audit of the facilities management function 100 A Every 3 years 40  Audit of Examination Criteria for Assessing Mission Achievement by the FHLBanks and the effectiveness of examination in ensuring that criteria is met by the	Audit of Effectiveness of IT Function in Meeting Needs of Finance Board Offices (contract)  Performance Audit - 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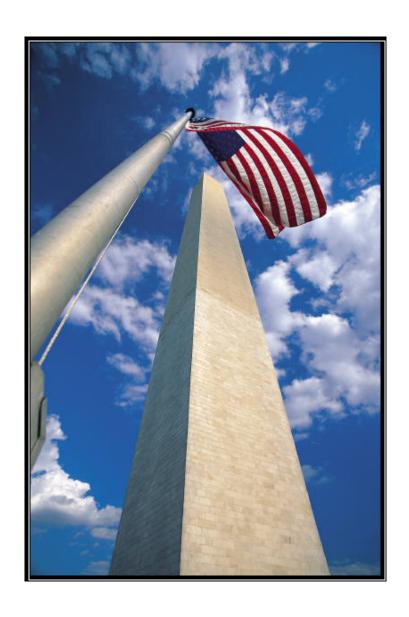
	Proposed Audits	Last Audited	Priority Scoring	Type Function	FREQUENCY	Staff Days	4/1/06-3/31/07	4/1/07-3/31/08	4/1/08-3/31/09	4/1/09-3/31/10	4/1/10-3/31/11
26	Audit of Effectiveness of Processing Issues thru the Finance Board (contract)	11/95	100	Р	One time	40	40				
27	Audit of the Effectiveness of FHFB Oversight of FHLBank Directors' Elections and Appointments	6/93	100	Р	One time	30		30			30
28	Audit of the Effectiveness of FHFB's Monitoring of new business activities.		100	Р	One time	60			60		
29	Audit of the quality of guidance for examiners	In-process	100	Α	One time	200	30				
30	Audit of the Effectiveness of examinations in assessing Dealers' compliance with underwriting agreement (contract)		95	P	Every 5 years	80			80		
									00		
31	FHFB's use of Contract Legal Services	2/93	95	Р	One time	40	_	40	_	_	
32	Compliance Audit of the Finance Board's Ethics Program		95	Р	One time	60			60		
33	Audit of Finance Board's promotion and retention process		95	А	One time	60				60	
34	Survey of FHFB's Procedures For Dissemination of Information and Soliciting Input From External Sources		95	P	One time	40					40
35	Audit of Effectiveness of Process for Performing Personnel Security Clearances (contract)		95	A	One time	40			40		
36	Audit of Finance Board Implementation of a Telecommuting Program (contract)	_	95	А	One time	80	80			_	
37	Audit of the Finance Board's Training Program		95	Α	Every 5 years	50			50		
38	Audit of the Effectiveness of examinations in assessing Community Investment Programs' implementation		-			406			100		
		6/93	90	Р	Every 5 years	100			100		
39	Audit of the Adequacy of FHFB's AHP Regulations	6/93 (GAO)	90	Р	Every 5 years	100				100	

	Proposed Audits	Last Audited	Priority Scoring	Type Function	FREQUENCY	Staff Days	4/1/06-3/31/07	4/1/07-3/31/08	4/1/08-3/31/09	4/1/09-3/31/10	4/1/10-3/31/11
40	Audit of the effectiveness of examinations in assessing FHLBanks' AMA products comply with FHFB regulations.		90	Р	Every 5 years	120		120			
41	Audit of the adequacy of the design of the AHP database to effectively meet end user needs		90	Р	One time	120			120		
42	Audit of the confidentiality, integrity, and availability of data in the AHP database.		90	Р	One time	80	_	_	_	_	80
43	Compliance Audit - Out of Town Travel Expenses (contract)	6/00	90	Α	Every 5 years	60		60			
44	Economy/Efficiency and Security Audit FHFB's Mailing/Shipping Costs (contract)	3/99	90	А	One time	20			20		
45	Audit of Effectiveness of Handling Confidential Documents in FHFB		90	Р	Every 5 years	40				40	
46	Audit of Supervision's Oversight of FHLBank Internal Audit Function	5/92	85	Р	One time	60				60	
47	Audit of FHFB's Cash Receipts (contract)	9/97	80	А	Annually	2	2	2	2	2	2
48	Audit of FHFB's Maintenance and Disposition of non-IT FF&E (contract)	6/94	80	А	Every 5 years	60	_	_	60	_	
49	Audit of FHFB's process for monitoring the Office of Finance's debt issuances	_	75	Р	Every 5 years	40			40		
50	Audit of the Adequacy of Community Support Program Regulations and Program Results	6/93	75	Р	Every 5 years	80				80	
51	Audit of the Process for Developing FHFB's Strategic Plan		75	Р	One time	40			40		
52	Audit of FHFB's Effectiveness in Identifying and Tracking FHFB related Legislative Issues		75	Р	One time	40				40	

	Proposed Audits	Last Audited	Priority Scoring	Type Function	FREQUENCY	Staff Days	4/1/06-3/31/07	4/1/07-3/31/08	4/1/08-3/31/09	4/1/09-3/31/10	4/1/10-3/31/11
53	Audit of FHFB's Accounts Payable (contract)	4/03	75	A	Annually	2	2	2	2	2	2
54	Survey of FHFB's EEO Function (contract)		75	Р	Every 5 years	80				80	
55	Audit of the Controls Over FHFB's Centrally Billed Procurement Credit Card Accounts (contract)		75	A	Every 5 years	40					40
56	Audit of the Controls Over FHFB's Centrally Billed Travel Credit Card Account (contract)	3/95	75	А	Every 5 years	40					40
57	Compliance Audit - Use of Individually Assigned Government Credit Cards (contract)	5/02	75	А	Every 5 years	60				60	
58	Audit of OS's Call Reporting System (CRS) data integrity (Contract)		75	Р	One time	160	160				
59	Compliance Audit - FHFB Lease Agreement with Bldg. Mgmt. (contract)		70	A	Every 5 years	20					20
60	Audit of the effectiveness and compliance of FHFB's incentive awards program		70	А	Every 5 years	20					20
61	Audit of FHFB's Cash Management and Budget Process (contract)		65	А	Every 5 years	40			40		
62	Audit of the Effectiveness of Examiner Coordination with Other Financial Regulatory Agencies		65	Р	Every 5 years	60				60	
63	Audit of FHFB's Accounts Receivable (contract)	2/01	65	А	Annually	2	2	2	2	2	2
64	Audit of Local Travel policies and Expenses (contract)	6/00	65	А	Every 5 years	60	_			_	60
65	Audit of FHFB's policies and procedures for the purchase of FF&E (contract)	6/93	65	А	Every 5 years	60					60
66	Audit of the Finance Board's personnel records management function (contract)		60	А	Every 5 years	60				60	

	Proposed Audits	Last Audited	Priority Scoring	Type Function	FREQUENCY	Staff Days	4/1/06-3/31/07	4/1/07-3/31/08	4/1/08-3/31/09	4/1/09-3/31/10	4/1/10-3/31/11
			Therity coorning	Tunotion	TREGOENOT	Dujs	11 1100 010 1107	111101 0101100	17 17 00 07 0 17 0 7	111107 0101110	17 17 10 070 17 11
67	Audit of Budgeting for non-IT Equipment		60	А	Every 5 tears	40					40
68	Performance Audit - Parking Program	4/98	60	А	Every 5 years	20		20			
69	Audit of Finance Board Grievance process	_	60	Р	One time	60	_			_	60
70	Audit of FHFB's Process for Facilitating the Sharing of Best Practices by the FHLBanks		60	Р	Every 5 years	40					40
71	Audit of the security of the AHP database		50	Р	One time	60					60
72	Audit of the Expenditures from Receptions & Representation Fund (contract)	6/02	50	А	Annually	10	10	10	10	10	10
73	Terminated/Ratified FHFB Contracts over \$2,500		45	Α	Annually	10	10	10	10	10	10
74	Audit of the usefulness of information published by OS's bank Analysis Division.		45		One time	80					
75	Performance Audit - FHFB's Lease Agreements for FF&E and Other Goods (contract)	6/93	40	А	Every 5 years	40				40	
76	Peer Review of Other Offices of Inspector General	12/03	30	Р	Every 3 years	15	15			15	
	Total Audit Staff Days Scheduled						1193	1158	1198	1163	1158
	·						1193	1100	1198	1103	1108
	Total OIG Staff Days Required				_		400	400	400	400	400
	Total Contract Audit Days Required						793	758	798	763	758





# FEDERAL HOUSING FINANCE BOARD OFFICE OF INSPECTOR GENERAL

Audit Plan

April 1, 2006 - March 31, 2007 Exhibit 3 to OIG's Strategic Plan

> Edward Kelley Inspector General

#### OIG'S ANNUAL AUDIT PLAN

#### Foreword

This annual audit plan, presented as Exhibit 3 to OIG's strategic plan, identifies the audit activity planned for the period April 1, 2006 through March 31, 2007. The audit activities were selected because of: 1) their relevance to the Finance Board's management officials, 2) the vulnerability of the area to be audited, and 3) the statutory mandate. The planned audit activity is subject to change due to unanticipated matters of higher priority. Such changes will be communicated to the Chairman and other Board Members, as appropriate.

The results of OIG audit activity will be reported to Finance Board management on an ongoing basis. The results of this audit activity will also be reported in the Inspector General's Semiannual report to the Congress as required by the Inspector General Act.

Edward Kelley Inspector General

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#### OFFICE OF INSPECTOR GENERAL

Audit Plan for April 1, 2006 - March 31, 2007

#### Table of Contents

Introduction	1
Overview of Audit Responsibilities and Definitions	2
Projects Completed from April 1, 2005 – March 31, 2006	3
Audit Ranking Criteria	4
Planned Audit Activities for April 1, 2006 – March 31, 2007	5
Legislated Reporting Requirements	9
Special Projects	10

#### INTRODUCTION

The Office of Inspector General (OIG) provides independent, professional audits, and investigations of the financial and operational activities of the Federal Housing Finance Board (Finance Board). The audits are performed in accordance with generally accepted government auditing standards, as set forth in the U.S. Comptroller General's *Government Auditing Standards*. The office conducts investigations in conformance with *Quality Standards for Investigations* issued by the President's Council on Integrity and Efficiency and Executive Council on Integrity and Efficiency. The office also performs other reviews and projects upon request by the Chairman and the Board that may involve the Federal Home Loan Banks and related entities.

For its audit responsibilities, OIG has established a plan of activities for the period April 1, 2006 – March 31, 2007, that are designed to meet Goal 1, Objectives A, B, and C of OIG's strategic plan. The planned audits also support the accomplishment of the Finance Board's strategic plan and help to prevent fraud, waste, and abuse. Audits are selected based upon: (a) the results of our audit activities for April 1, 2005 – March 31, 2006; (b) the Finance Board's strategic plan; (c) recommendations of agency managers and other Federal Home Loan bank System stakeholders; (d) predetermined criteria – as set forth on page four; (e) the professional standards and requirements of the Comptroller General, the American Institute of Certified Public Accountants, and the Office of Management and Budget; and (f) Congressional emphasis on combating fraud, waste, and abuse.

This audit plan takes into consideration, but does not document, OIG resources committed to other OIG functions such as investigations and legislation/regulation reviews. The audit plan is subject to revision during the year, as priorities may shift because of: (a) unanticipated changes in the agency's strategic plan; (b) matters found during our audit work, (c) special projects requested in addition to those presently anticipated, or (d) other, circumstances which are unforeseen at this time. The plan has been developed based on the current authorized staffing level of OIG, and the timeframes noted have been broadened to accommodate a variety of other work-related activities and projects that may be requested during the period.

# OVERVIEW OF AUDIT RESPONSIBILITIES AND DEFINITIONS

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. These audits are prepared in accordance with generally accepted government auditing standards and vary in scope and complexity. They may be detailed and complex in scope or they may be limited reviews and inspections. A "survey" is the first phase of an audit and is performed to identify areas where more detailed audit work is warranted. The <u>Government Auditing Standards</u>, promulgated by the U.S. Government Accountability Office, identify the following three types of audits:

*Financial audits* include determining whether: (a) financial information is presented in accordance with established or stated criteria; (b) the entity has adhered to specific financial compliance requirements; and (c) the entity's internal control structure over financial reporting and/or safeguarding assets is suitably designed and implemented to achieve the control objectives.

**Economy and efficiency audits** include determining: (a) whether the entity is acquiring, protecting, and using its resources (such as personnel, property, and space) economically and efficiently; (b) the causes of any inefficient or uneconomical practices; and (c) whether the entity has complied with laws and regulations concerning economy and efficiency.

**Program audits** include determining: (a) the extent to which the desired results or benefits established by the legislature or other authorizing body are being achieved; (b) the effectiveness of organizations, programs, activities, or functions; and (c) whether the entity has complied with significant laws and regulations applicable to the program.

The <u>Inspector General Act of 1978</u>, as amended, added a fourth dimension to auditing, by charging auditors within the Federal establishment with the responsibility for identifying potential or actual instances of waste and fraud in government activities. This responsibility is also included in the *Government Auditing Standards*.

#### <u>PROJECTS COMPLETED FROM APRIL 1, 2005 – MARCH 31, 2006</u>

OIG completed the following audits and related projects:

- 1. An audit of the Finance Board's Fiscal Year 2005 Financial Statements was issued on November 15, 2005;
- 2. A semiannual report to the President and the Congress for the period October 1,2004 to March 31, 2005 issued April 29, 2005;
- 3. OIG's vulnerability assessment for Fiscal Year 2005 was issued on September 16, 2005;
- 4. An audit of the Finance Board's Compliance with the Federal Information Security Management Act was issued on September 28, 2005;
- 5. A semiannual report to the President and the Congress for the period April 1,2005 to September 30, 2005 was issued on November 10, 2005;
- 6. A limited review report on the Finance Board's implementation of OMB Circular A-123 was issued on November 15, 2005;
- 7. An audit report on the Finance Board's Call Reporting System was issued on July 26, 2005;
- 8. A Survey report on the Finance Board's Office of Supervision was issued on October 27, 2005;
- 9. Reviews and comments on various proposed agency policies and procedures were provided during the period of April 1, 2005 through March 31, 2006.

#### **AUDIT RANKING CRITERIA**

This year's audit plan was developed from a list of potential audit areas that were rated according to the following criteria:

- 1. The priority of the Chairman and/or Members of the Board of Directors,
- 2. Based on the Finance Board's strategic plan, the relative importance of the program or activity to the Finance Board's mission,
- The amount of Finance Board resources committed to the program or activity,
- 4. The potential for fraud, waste, or abuse to occur in the program or activity,
- 5. Management needs identified through consultation with primary organization heads,
- 6. Legislative or regulatory requirements and/or Congressional, Office of Management and Budget (OMB), or Government Accountability Office (GAO) recommendations,
- 7. The extent of audit coverage provided by GAO, consultants or other entities,
- 8. The newness, changed conditions, or sensitivity of the program or activity,
- 9. The existence of required in-house staff expertise,
- 10. The adequacy of internal control systems in place for the program or activity, and
- 11. The extent of outstanding issues resulting from prior audit coverage or review by OIG and other audit entities.

In applying these criteria for the April 1, 2006 – March 31, 2007 audit year, we selected the audits, surveys, management reviews, and liaison activities that are represented under appropriate captions on the following pages.

#### Audit of the Disposition of IT Equipment

We will conduct an audit of the economy and efficiency with which the Finance Board disposes of IT equipment and the agency's adherence to applicable laws and regulations.

Planned period for audit: June 2005 - April 2006.

#### Audit of the quality of guidance provided to Office of supervision Examiners

We will review the quality of guidance that Office of Supervision examiners receive to support their efforts to identify safety and soundness issues at the FHLBanks.

Planned period for audit: January 2006-April 2006

#### Audit of the Accuracy of Merit Pay Calculations

We will review the propriety of procedures for calculating employees' merit pay increases and determine the agency's compliance with the procedures.

Planned period for audit: February – April 2006

## Audit of the Effectiveness of Examiner Recruitment, Selection, and Retention

We will review the agency's procedures for recruiting, selecting, and retaining examiners to assess their effectiveness in having examinations performed by experienced and qualified examiners.

Planned period for audit: May – July 2006

# <u>Audit of the Finance Board's Compliance with Section 522 of the</u> <u>Consolidated Appropriations Act of 2005 Regarding Privacy Measures</u> (contract)

We will conduct an audit of the Finance Board's policies, procedures, and practices designed to protect privacy information in accordance with the Act.

Planned period for audit: April – July 2006

### Audit of the Data Integrity of the Finance Board's Call Reporting System (contract)

We will review agency procedures for ensuring the confidentiality, reliability, and accuracy of the input data and out-put information of the Call Reporting System.

Planned period for audit: May – August 2006

#### Audit of the Finance Board's compliance with the Federal Information Security Management Act (FISMA) (contract)

We will review the IT office's security measures for the agency to assess the agency's vulnerability to information loss or theft.

Planned period for audit: May – September 2006

#### Audit of FHFB's FY'2006 Financial Statements (contract)

We will contract with a certified public accounting firm to annually audit the Finance Board's Financial Statements. The audit will encompass a review of financial transactions, accounts, and reports, including an evaluation of compliance with significant financial laws, regulations, and policies of the Finance Board, and an evaluation of internal accounting control.

Planned period for audit: May – November 2006

#### <u>Audit of the Thoroughness of Examinations in Identifying Safety and</u> Soundness Issues

We will review the effectiveness of the examination function in timely identifying safety and soundness issues at Federal Home Loan banks.

Planned period for audit: August – December 2006

#### <u>Limited Review of the FHFB's implementation of OMB Circular A-123</u> (contract)

To comply with requirements of OMB Circular A-123, the Finance Board is required to annually assess and report on the overall adequacy and effectiveness of management controls within the agency. We will conduct a limited review of the process used to assess the agency's internal control system.

Planned period for audit: October 2006

#### <u>Peer Review of the National Credit Union Administration Office of</u> Inspector General's Audit Function

We will review the audit function of the NCUA-OIG to ensure its operations are in compliance with the Inspector General Act of 1978, as amended.

Planned period for audit: November 2006

#### Audit of Effectiveness of Processing Issues thru the Finance Board (contract)

We will conduct an audit to assess the effectiveness of agency controls for ensuring the timely and consistent sharing of issues requiring Board members' input and resolution.

Planned period for audit: November 2006 – January 2007

#### Audit of Finance Board Implementation of a Telecommuting Program

We will conduct an audit to determine whether the Finance Boards telecommuting policies and procedures comply with applicable OPM regulations and to identify possible telecommuting opportunities at the Finance Board.

Planned period for audit: January – March 2007

#### Audit of Finance Board's Records Management Program (Contract)

We will contract with a records management firm to conduct an audit to determine whether the Finance Boards records management program and practices are adequate to properly safe guard agency records.

Planned period for audit: January – March 2007

#### Follow-up on Completed Audits

We will follow-up with Finance Board managers to determine the extent to which corrective actions have been taken on audit recommendations.

Planned period for follow-up: Quarterly

#### Audit of Ratified and Terminated Contracts in Excess of \$2,500

We will audit all contracts terminated/ratified during the period April 1, 2006 through March 31, 2007 to assess whether the Finance Board received services and/or goods consistent with the amounts paid to contractors.

Planned period for audit: As appropriate

#### LEGISLATED REPORTING REQUIREMENTS

#### Semiannual Reports to Congress

In accordance with the <u>Inspector General Act of 1978</u>, as amended (IG Act), we will prepare and transmit to the Congress semiannual reports on the activities of the Inspector General Office at the Finance Board. We will prepare, no later than April 30, 2006 and October 31, 2006, semiannual reports that summarize OIG activities during the immediately preceding six-month periods ending March 31, 2006 and September 30, 2006. OIG semiannual reports will be furnished to the Chairman of the Finance Board and in accordance with the <u>IG Act</u>, within 30 days of receiving the reports; the Chairman is required to transmit the report and certain other information to the appropriate committees and subcommittees of the Congress.

Planned period for project: April and October 2006

#### SPECIAL PROJECTS

Because of our auditing, accounting, and operational expertise and familiarity with the operations of the entire Finance Board, the Office of Inspector General is available to perform special projects and offer advice as requested by the Chairman, members of the Board of Directors, and Finance Board management. From time to time, matters come to our attention during the year that are not anticipated when the audit plan is established. Such matters may be documented internally for consideration in a scheduled audit. If the matter does not relate to a scheduled audit, we determine if immediate action is required, and if such action will significantly alter our scheduled work. The Chairman and other Board members will be advised of changes to the audit plan that result from unscheduled work.