

# *FEDERAL HOUSING FINANCE BOARD*



*Photos from "Habitat for Humanity"*

## OFFICE OF INSPECTOR GENERAL



# *SEMIANNUAL REPORT*

*FOR THE PERIOD  
April 1, 2005 – September 30, 2005*



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EDWARD KELLEY  
INSPECTOR GENERAL

## TABLE OF CONTENTS

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<i>Executive Summary</i> .....	1
<i>Background on the FHLBank System, the Finance Board, And the Office of Inspector General</i> .....	3
<i>Audit Activity</i> .....	5
<i>Investigative Activity</i> .....	6
<i>Summary of "Section 5" Reporting Requirements</i> .....	7
<b>Table A</b> – <i>Listing of Completed Audits, Surveys, Limited Reviews, and Evaluations</i> .....	9
<b>Table B</b> – <i>Summary of Investigations</i> .....	10
<b>Table C</b> – <i>IG Reports with Questioned/Unsupported Costs</i> ... ..	11
<b>Table D</b> – <i>IG Reports Recommending Better Use of Funds</i> .....	12

## EXECUTIVE SUMMARY

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The mission of the Office of Inspector General (OIG) at the Federal Housing Finance Board (Finance Board) is to support the agency's overall mission and goals established by the President, the Congress, and the Finance Board, while helping to protect the agency from fraud, waste, and abuse. Consistent with OIG's strategic plan for the period, April 1, 2004 to March 31, 2009, and in accordance with the Inspector General Act of 1978, as amended (IG Act), we have relied on audits, investigations, and formal and informal technical assistance to accomplish our mission. OIG's strategic plan and annual audit plan are designed to support the Finance Board's strategic plan. In that regard, we have undertaken work aimed at evaluating the examination and supervision function and industry reporting requirements. We remained an active member in the federal Inspector General community to facilitate our statutory mandate to participate in government-wide efforts to prevent fraud, waste, and abuse and to remain current on matters affecting the IG community as well as the Finance Board. We continued to rely heavily on contracting for resources to accomplish required audits and investigations.

We conducted audits and audit recommendation follow-up of agency program and administrative functions. These audits were conducted in accordance with generally accepted government auditing standards issued by the Government Accountability Office. Five audits were in process at the beginning of the reporting period and two audits were initiated during the period. By the end of this reporting period, OIG had completed: 1) an audit of the Finance Board's Call Reporting System; and 2) an audit of the Finance Board's compliance with the Federal Information Security Management Act. An audit of the Finance Board's records management activities was suspended indefinitely due to higher OIG priorities. Four audits remained in process by the end of the reporting period. They were: 1) a Limited Review of the Finance Board's implementation of OMB Circular A-123, 2) a survey of the Office of supervision, 3) an audit of the disposition of IT equipment, ), and 4) an audit of the Finance Board's Fiscal Year 2005 Financial Statements. In addition, we continued our process of automating our audit working papers to improve process efficiency and security.

Our investigative activity was performed in accordance with [Quality Standards for Investigations](#) issued by the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE). Investigative matters were appropriately coordinated with officials in the Department of Justice, the Federal Bureau of Investigations, and other law enforcement entities. We continued to focus on resolving investigative matters expeditiously and identifying control weaknesses that may contribute to possible fraud or abuse. We began the period with one allegation of possible wrongdoing in process and no investigation in process. During the reporting period, we received two allegations. One related to the possible improper use of confidential information by officials at a FHLBank and the other related to the propriety of a sole source contract award. One allegation remained in process at the end of the period.

We continued to maintain positive working liaisons with: 1) Finance Board officials, in efforts to identify and correct management problems and to clarify OIG authorities and responsibilities; 2) the Congress, in order to keep them appropriately informed; 3) external auditors, to facilitate timely and accurate reporting on Finance Board operations; and 4) the Inspector General community, to keep apprised of evolving issues that affect the Finance Board. Specifically, OIG continued to monitor and provide informal input, as appropriate, into management efforts to enhance the agency's information technology function and efforts to enhance agency security. We also continued to coordinate with other financial regulatory agencies and the Government Accountability Office on audits and reviews impacting the Finance Board. In addition, OIG participated in activities involving the entire Inspector General community. As part of our affiliation with the ECIE, we continued to coordinate peer reviews of ECIE members' audit operations – a mechanism for assuring quality audits by Inspectors General. We also responded to various inquiries involving the activities of the Inspector General community.



Edward Kelley  
Inspector General

*BACKGROUND ON THE FHLBANK SYSTEM, THE FINANCE BOARD,  
AND THE OFFICE OF INSPECTOR GENERAL*

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The Federal Home Loan Bank System (FHLBank System) was created in 1932 to promote home ownership and a strong home finance industry. Its network of 12 district Federal Home Loan Banks (FHLBanks) provides lending, deposit, and other services to member institutions. Originally, the FHLBank System's membership was limited to thrift institutions, whose membership was mandatory. Since the FHLBank System's inception, membership has grown to include savings and loans, savings banks, cooperative banks, and a small number of insurance companies. As of August 1989, membership was opened to commercial banks and credit unions that meet a commitment to housing finance, as defined in law. As of May 13, 2000, membership for all financial institutions in the system became voluntary.

The 12 FHLBanks borrow funds in the nation's credit markets to lend to the FHLBank System member institutions, which numbered 8,083 as of June 30, 2004. These institutions, in turn, use the funds for home mortgages, to meet savings withdrawal needs, and for other authorized purposes. As of June 30, 2004, the FHLBanks had outstanding loans (Advances) to member institutions totaling \$558 billion for these purposes. In addition, through its Affordable Housing Program (AHP), the FHLBank System provided approximately \$2.4 billion to active and completed projects to help house some of America's neediest families. As of June 30, 2005, a total of more than 437,100 housing units were approved. Under the competitive application program, the AHP funded almost 390,000 units of which 70% were for very-low income households. The AHP homeownership set-aside program has funded more than 47,800 housing units. Concurrent with affordable housing efforts, the Federal Home Loan Bank System has increased its efforts in overall community development through its Community Investment Program (CIP). CIP lending for the life of the program is more than \$35 billion as of December 31, 2003. The Office of Finance is the fiscal agent for the FHLBank System. The Office of Finance's primary role is to manage the sale of the FHLBank System's consolidated obligations to investors, and to service the FHLBank System's debt.<sup>1</sup>

The Federal Housing Finance Board (Finance Board), with a fiscal year 2005 budget of approximately \$36.5 million and 130 employees, is the regulator of the FHLBank System. It is an independent agency established by the Financial Institutions Reform, Recovery, and Enforcement Act of 1989. The Finance Board's function is to ensure that FHLBanks: 1) operate in a safe and sound manner; 2) carry out their housing finance mission; and 3) remain adequately capitalized and able to raise funds in the capital markets. The Finance Board receives its operating funds from assessments levied against the 12 FHLBanks.

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<sup>1</sup> All statistics presented in the preceding paragraph represent the most current statistics available at the Federal Housing Finance Board.

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The Finance Board has only indirect involvement – through the 12 FHLBanks – with the FHLBank System's member institutions. Unlike its predecessor, the Federal Home Loan Bank Board, the Finance Board neither monitors nor examines any of the individual members of the FHLBank System. The actual monitoring, examination, and regulation of individual member institutions is left to the Office of Thrift Supervision, a separate federal government agency. The Finance Board is responsible for annually examining the 12 FHLBanks and the Office of Finance.

Approximately 69 percent of the Finance Board's staff resources are dedicated, in whole or in part, to: 1) examining the safety and soundness of the 12 FHLBanks and the Office of Finance; 2) reviewing and evaluating the work of each FHLBank's internal audit staff; 3) monitoring FHLBank System compliance with laws, regulations, policies, and procedures; 4) assessing the FHLBank System's financial condition; 5) modeling and analyzing the implementation of financial policies; 6) maintaining and promulgating membership policies; 7) monitoring the election and appointment of FHLBank Directors; 8) collecting information on individual FHLBank policies and marketing activities; and 9) monitoring and reviewing FHLBank and members' compliance with requirements of the Affordable Housing Program and the Community Investment Program.

The Office of Inspector General (OIG) is responsible for the conduct of audits and investigations at the Finance Board in accordance with generally accepted government auditing standards and investigative standards. OIG may also conduct audit or investigative activities at the 12 FHLBanks and other related entities when: 1) requested to do so by the Chairman; 2) necessary to obtain information on the Finance Board's administration of its program; and 3) aimed at detecting fraud or inefficiency in the administration or operation of Finance Board programs.

## AUDIT ACTIVITY

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On April 19, 2004, OIG issued its Strategic Plan for the period April 1, 2004 to March 31, 2009. OIG's annual audit plan for the period April 1, 2005 to March 31, 2006, is included as an Exhibit to the five-year strategic plan. During the semiannual reporting period April 1, 2005 through September 30, 2005, OIG completed two audits and suspended work on one audit due to other priorities ([Table A](#) on page 9). At the conclusion of this period, OIG also had four audits in process. OIG continued to coordinate with the Government Accountability Office and the Inspector General community on audits that impact the Finance Board. Specifically, OIG's audit activities included:

### COMPLETED

An audit of the Finance Board's compliance with the Federal Information Security Management Act, and

An audit of the Finance Board's Call Reporting System.

### WORK-IN-PROCESS

A Limited Review of the Finance Board's implementation of OMB Circular A-123,

An audit of the Disposition of IT Equipment,

A survey of the Office of Supervision, and

An audit of the Finance Board's Fiscal Year 2005 Financial Statements.



## INVESTIGATIVE ACTIVITY

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The number of investigative matters processed by the Office of Inspector General during this reporting period remained approximately the same. We had one investigative matter in process at the beginning of the reporting period and we received two additional allegations. Two of the allegations involved possible improper conduct by FHLBank Directors and the third involved the propriety of a sole source contract award. By the end of the period, two allegations were closed and the third was in the preliminary investigation stage.

[Table B](#), on page 10, contains a numerical summary of investigations, allegations, preliminary inquires, and referrals.

## SUMMARY OF "SECTION 5" REPORTING REQUIREMENTS

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1. Significant problems, abuses, deficiencies disclosed by management and IG's recommended corrective actions [5a(1) and (2)]  
None
2. Previously reported significant recommendations with incomplete corrective actions [5a(3)]  
None
3. Prosecution, convictions, and referrals [5a(4)]  
None
4. Reports on failure to provide information or assistance [5a(5)]  
None
5. List of issued audit reports [5a(6)]  
See attached [Table A](#).
6. Summary of significant reports [5a(7)]  
None
7. Statistical table – audits with questioned/unsupported costs [5a(8)]  
See attached [Table C](#).
8. Statistical table – audits recommending that funds be put to better use [5a(9)]  
See attached [Table D](#).

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**9. Summary of prior-period audits with no current management decisions [5a(10)]**

None

**10. Reasons for revisions of significant management decisions [5a(11)]**

None

**11. OIG disagreement with management decisions [5a(12)]**

None

TABLE A

LISTING OF COMPLETED AUDITS, SURVEYS, LIMITED REVIEWS,  
AND EVALUATIONS

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<u>REPORT NUMBER REPORT</u>	<u>DATE COMPLETED</u>	<u>TITLE OF</u>
05-A-03-CIO/OM	September 28, 2005	Audit of the Finance Board's Compliance with the Federal Information Security Management Act
05-A-02-OM/OS	July 26, 2005	Audit of the Finance Board's Call Reporting System

## SUMMARY OF INVESTIGATIONS

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<u>BEGINNING CASES</u>	<u>NUMBERS</u>
Cases Pending at the Beginning of Period:	
At the Finance Board.....	0
At the Department of Justice.....	1
At other agencies.....	0
 <u>NEW CASES RECEIVED</u>	
Allegations Received During Current Period.....	2
 <u>STATUS OF CASES</u> (as of September 30, 2004)	
Resulted in:	
Allegations Pend. Completion of Prelim. Invest/Audit.....	1
Preliminary Investigation Completed- (Cases Closed).....	1
Cases Pending Completion of Full Investigation.....	0
Full Investigation Completed- (Cases Closed).....	1
Cases Scheduled for Audit/Ltd. Rev. -(Cases Closed).....	0
Cases Pending Decision by Finance Board management.....	0
Cases Pending Decision by Dept. of Justice.....	0
Cases Pending Decision by Other Agencies.....	0
Cases Referred to FHFB Management- (Cases Closed).....	0
Referred to Other Agencies- (Cases Closed).....	0
 <u>DISPOSITION</u>	
Civil.....	0
Criminal.....	0
Administrative Sanctions.....	0
Corrective Action Taken.....	0
Other (Pending/Referrals, etc.).....	0

TABLE C

INSPECTOR GENERAL REPORTS  
WITH QUESTIONED/UNSUPPORTED COSTS

	<u>DOLLAR VALUE</u>		
	<u>NUMBER OF REPORTS</u>	<u>QUESTIONED COSTS</u>	<u>UNSUPPORTED COSTS</u>
a. For which no management decision has been made by the commencement of the reporting period.....	0	0	0
b. Which were issued during the reporting period.....	0	0	0
Subtotals (a+b).....	0	0	0
c. For which a management decision was made during the reporting period.....	0	0	0
(i) dollar value of disallowed costs....	0	0	0
(ii) dollar value of costs not disallowed.....	0	0	0
d. For which no management decision has been made by the end of the reporting period.....	0	0	0
e. Report for which no management decision was made within six months of issuance.....	0	0	0

**Note:** Boldface type entries reflect actual statutory language.

TABLE D

INSPECTOR GENERAL REPORTS  
RECOMMENDING THAT FUNDS BE PUT TO BETTER USE

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	<u>NUMBER OF REPORTS</u>	<u>DOLLAR VALUE</u>
a. For which no management decision has been made by the commencement of the reporting period.....	0	0
b. Which were issued during the reporting period.....	0	0
Subtotals (a+b).....	0	0
c. For which a management decision was made during the reporting period.....	0	0
(i) dollar value of recommendations that was agreed to by management.....	0	0
- based upon proposed management action.....	0	0
- based upon proposed legislation action.....	0	0
(ii) dollar value of recommendations that were not agreed to by management.....	0	0
d. For which no management decision has been made by the end of the reporting period.....	0	0
e. Reports for which no management decision was made within six months of issuance.....	0	0

Note: Boldface entries reflect actual statutory language.