

# FARM CREDIT ADMINISTRATION OFFICE OF INSPECTOR GENERAL



## SEMIANNUAL REPORT TO CONGRESS

OCTOBER 1, 2023 – MARCH 31, 2024

# FCAOIG

Farm Credit Administration  
Office of Inspector General

# A MESSAGE FROM THE INSPECTOR GENERAL

I am pleased to submit our Semiannual Report to Congress, summarizing the activities and accomplishments of the Farm Credit Administration (FCA or Agency) Office of Inspector General (OIG) for October 1, 2023, through March 31, 2024.

This reporting period was another productive one for our office. These six months saw our audit, inspection, and evaluation function complete an inspection that analyzed Agency efforts to identify dependencies in key positions and personnel and mitigate the risks associated with those dependencies. This inspection, which found a significant portion of Agency leadership to be retirement eligible in the coming years, identified several opportunities for FCA to improve succession planning, limit risks, and promote consistency across Agency offices. We also completed a statutorily required inspection of FCA's compliance with the Payment Integrity Information Act and oversaw a contracted audit of the Agency's financial statements.

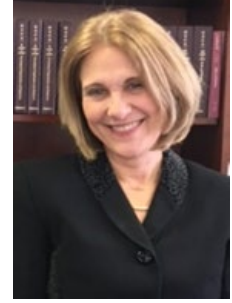
These months also saw our office timely address complaints and information submitted through our office's hotline, including our new online complaint form. This complaint form, developed in coordination with FCA's Office of Information Technology, will help ensure that our office has all the information it needs to appropriately address allegations of fraud, waste, abuse, and mismanagement. Launched in February 2024, the form also simplifies the process of filing anonymous complaints.

We continued to fulfill our responsibility to participate in the projects of the Council of the Inspectors General on Integrity and Efficiency (CIGIE). OIG staff dedicated their time to multiple CIGIE workgroups and committees, including the Inspection and Evaluation Committee, which I chaired throughout the reporting period. Through these efforts, our office is able to have a government-wide impact on economy and efficiency, the prevention and detection of fraud, waste, and abuse, and professionalism in the inspector general community.

Lastly, I would once again like to express my appreciation for the professionalism exhibited by FCA leadership and staff over these six months. Their cooperation and support are absolutely essential to our oversight, ensuring that we can deliver credible and effective work products in a timely manner.



Wendy R. Laguarda  
Inspector General



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# ACRONYMS AND ABBREVIATIONS

<b>CIGIE</b>	Council of the Inspectors General on Integrity and Efficiency
<b>Farmer Mac</b>	Federal Agricultural Mortgage Corporation
<b>FCA (or Agency)</b>	Farm Credit Administration
<b>HRK</b>	Harper, Rains, Knight & Company, P.A.
<b>I&amp;E</b>	Inspection and Evaluation
<b>IG</b>	Inspector General
<b>IG Act</b>	Inspector General Act of 1978, as amended
<b>OIG</b>	Office of Inspector General
<b>OMB</b>	U.S. Office of Management and Budget
<b>PIIA</b>	Payment Integrity Information Act of 2019
<b>Pub. L.</b>	Public Law
<b>System</b>	Farm Credit System
<b>U.S.</b>	United States
<b>U.S.C.</b>	United States Code

# BACKGROUND

## The Farm Credit System

First established in 1916, the Farm Credit System (System) is a nationwide network of borrower-owned cooperative financial institutions and service organizations. A government-sponsored enterprise, the System is designed to better the income and well-being of farmers, ranchers, and rural America by providing a safe and reliable source of credit and related financial services.

As of January 1, 2024, the System consisted of three farm credit banks, one agricultural credit bank, one federal land credit association and 55 agricultural credit associations that primarily make loans to agriculture in all 50 states and Puerto Rico, as well as six service corporations that provide administrative, technology-related, and other support services to certain System entities and eligible borrowers.

Created in 1988, the Federal Agricultural Mortgage Corporation (Farmer Mac) provides a secondary market for agricultural loans. A stockholder-owned, federally chartered corporation, Farmer Mac is an institution of the System, but is not liable for any debt or obligation of any other System institution.

## The Farm Credit Administration

The Farm Credit Administration (FCA or Agency) is the independent federal agency responsible for ensuring that the System remains a dependable source of credit for agriculture and rural America. Authorized by the Farm Credit Act of 1971, as amended,<sup>1</sup> FCA ensures the safety and soundness of System institutions by issuing policies and regulations and by regularly examining System institutions. FCA has five office locations and over 300 employees.



FCA is overseen by a three-person board, members of which are appointed by the President, with the advice and consent of the Senate. The Chairman—who is designated by the President and serves in that role until the end of the Chairman’s term—also serves as the Agency’s Chief Executive Officer. Throughout the reporting period, the Board had three members: Board Chairman Vincent G. Logan, Board Member Jeffery S. Hall, and Board Member Glen R. Smith.

## The Office of Inspector General

Established in January 1989, the Office of Inspector General (OIG) is charged with the task of providing independent and objective oversight of FCA programs and operations. It carries out this responsibility as authorized by and in accordance with the Inspector General Act of 1978, as amended<sup>2</sup> (IG Act), by conducting and supervising audits, inspections, evaluations, and investigations; promoting economy and efficiency; preventing and detecting fraud, waste, and abuse; and keeping the FCA Board and Congress fully and currently informed about problems and deficiencies related to FCA.

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<sup>1</sup> 12 U.S.C. § 2001 *et seq.*

<sup>2</sup> 5 U.S.C. §§ 401–424.



Located within FCA, the OIG operates independently—outside the direction of Agency leadership. While the Inspector General (IG) is appointed by and serves under the general supervision of the FCA Board, neither the Board nor any other Agency official may prevent or prohibit the IG from carrying out an oversight activity that the IG determines to be necessary or appropriate. The IG also exercises discretion in OIG employment and contracting decisions, further safeguarding the office’s independent status. This independence is necessary to ensure that OIG products meet the highest standards of objectivity and credibility.

The OIG is led by Wendy R. Laguarda, who has served as the IG since August 2017. Reporting to the IG are the Assistant Inspector General for Audits, Inspections, and Evaluations, the Investigator, and the Counsel to the Inspector General. The Assistant Inspector General for Audits, Inspections, and Evaluations supervises the audit staff and oversees the audit, inspection, and evaluation functions.

### **The Council of the Inspectors General on Integrity and Efficiency**

The FCA IG also serves as a member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE). Composed of the federal inspectors general and certain other federal officials, CIGIE was established to address cross-agency issues of integrity, economy, and effectiveness and to improve the professionalism and effectiveness of OIG personnel. OIG staff regularly participate on CIGIE committees and initiatives, as discussed in this report.



# STRATEGIC PLAN

In September 2019, the OIG adopted a five-year [strategic plan for fiscal years 2020 to 2024](#). Revised in 2021, the plan details the vision, mission, values, goals, and objectives of the OIG in carrying out its responsibilities under the IG Act.

The OIG's vision, mission, values, and goals are outlined below.

## Vision

Harvesting Change

## Mission

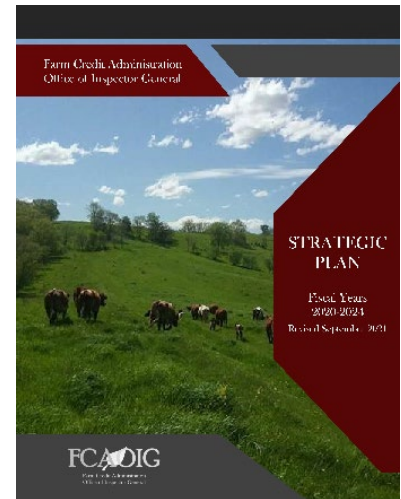
To provide independent oversight to promote economy, efficiency, and effectiveness, and prevent and detect fraud, waste, and abuse in Farm Credit Administration programs and operations

## Values

Objectivity, Integrity, Relevance, and Respect

## Goals

- 1) Promote Economy and Efficiency
- 2) Prevent and Detect Fraud, Waste, and Abuse
- 3) Strengthen Internal and External Relationships





# AUDITS, INSPECTIONS, AND EVALUATIONS

The OIG regularly performs audits, inspections, and evaluations of FCA programs and operations. In so doing, OIG personnel seek to provide timely, credible, and relevant information to Agency leadership, Congress, other stakeholders, and the general public. FCA OIG audits are performed in accordance with

generally accepted government auditing standards issued by the U.S. Government Accountability Office, while inspections and evaluations adhere to the CIGIE *Quality Standards for Inspection and Evaluation*.



In planning its audits, inspections, and evaluations, the OIG employs a risk-based approach that accounts for prior oversight work, the control environment, input from the FCA Board and senior management, statutory requirements, and resources. For more information, and to learn about future OIG work, please see the [audit, inspection, and evaluation plan for fiscal years 2024 and 2025](#).

Reports issued may be found on the [OIG website](#) within three business days of issuance to the FCA Board. To receive a notification when a new report is published, please [subscribe](#) to the OIG mailing list. Reports are also posted on [Oversight.gov](#), a consolidated repository for the oversight work of federal inspectors general. Oversight.gov allows users to sort, search, and filter the site's database to find reports of interest.



## Summaries of Reports Issued

The OIG issued three reports and made five recommendations for corrective action during the reporting period. The reports are summarized below.

### **The Identification and Mitigation Efforts for Key Position and Personnel Dependencies at the Farm Credit Administration I-23-03**

The OIG has consistently highlighted human capital management as a significant management challenge facing FCA. The Agency's success in its mission depends greatly on its ability to identify current and future staffing needs and recruit and retain a talented and diverse workforce. The objective of this inspection was to analyze FCA's efforts to identify dependencies in key positions and personnel and mitigate the risks associated with those dependencies. Among other steps, the OIG analyzed Agency employee data by grade level and office to determine retirement eligibilities through 2023 and 2030, reviewed succession planning materials, and looked at the techniques employed by each FCA office to mitigate the risks associated with key position and personnel dependencies.

The OIG found that all FCA offices had identified key position and personnel dependencies in some way. Certain offices had documented these efforts through succession plans or established lines of responsibility. Some offices had taken steps to identify their staff's knowledge, skills, and abilities, enabling them to better identify and understand gaps and risks. The OIG also determined that certain

Agency offices had organizational structures that mitigated the risks associated with key position and personnel dependencies.

Furthermore, the OIG found opportunities for the Agency to improve its process for succession planning and the identification and mitigation of key dependencies. The OIG noted that FCA offices had taken inconsistent approaches, which could be attributed to the absence of Agency-wide guidance on the subject. The OIG made five recommendations, focused on developing guidance for identifying key position and personnel dependencies, leadership and executive development training, and analyzing how offices can improve their mitigation efforts and promote consistency in the Agency. FCA management agreed with, and provided responsive corrective actions for, all recommendations made in the report.

The OIG issued the [inspection report](#) on February 20, 2024.

**Farm Credit Administration's Compliance with the  
Payment Integrity Information Act of 2019 for Fiscal Year 2023  
I-24-01**

Enacted in March 2020, the Payment Integrity Information Act of 2019 (PIIA) aimed to improve governmentwide efforts to identify and reduce improper payments, setting forth various reporting requirements for federal agencies. PIIA requires OIGs to determine annually whether their respective agencies complied with PIIA requirements, in accordance with guidance issued by the U.S. Office of Management and Budget (OMB) and CIGIE.

This inspection determined that FCA complied with PIIA requirements applicable to the Agency for fiscal year 2023, and based on the limited review performed, that the Agency's efforts to prevent and reduce improper payments appeared to be reasonable. FCA published on its website a Performance and Accountability Report, which included the Agency's annual financial statements and required payment integrity information. The Agency also reported payment integrity data to [PaymentAccuracy.gov](https://www.paymentaccuracy.gov). Because the Agency conducted improper payment risk assessments in May 2021 and determined that all of its programs and activities were low risk and not susceptible to significant improper payments, FCA is not required to complete risk assessments again until fiscal year 2024. Other PIIA reporting requirements were not applicable to the Agency in fiscal year 2023.

The OIG issued the [inspection report](#) on February 5, 2024.

**Farm Credit Administration's Financial Statements  
Fiscal Year 2023  
A-23-FS**

FCA is required each year to submit audited financial statements to Congress and OMB. These financial statements must be audited in accordance with generally accepted government auditing standards by the IG or an independent external auditor. For fiscal year 2023, the OIG engaged the independent public accounting firm Harper, Rains, Knight & Company, P.A. (HRK) to audit FCA's financial statements. The OIG monitored the work of HRK.

HRK concluded the audit in November 2023, issuing an unmodified opinion signifying that the financial statements presented fairly, in all material respects, FCA's financial position as of September 30, 2023,

and 2022, and its net cost of operations, changes in net position, and budgetary resources for the fiscal years then ended, in accordance with generally accepted accounting principles.

HRK considered FCA’s internal control relevant to the financial statement audit as a basis for designing audit procedures that are appropriate for the purpose of expressing an opinion on the financial statements. The auditors did not express an opinion on the effectiveness of internal control over financial reporting; however, they did not identify any deficiencies that HRK considered to be significant deficiencies or material weaknesses. Additionally, HRK performed tests of FCA’s compliance with selected provisions of laws, regulations, and contracts that would have a direct and material effect on the financial statements. While HRK did not express an opinion on compliance with those provisions, they did not identify any instances of reportable noncompliance.

The OIG’s monitoring and review of HRK disclosed no instances where HRK did not comply, in all material respects, with generally accepted government auditing standards. The OIG issued the [audit report](#) on November 14, 2023.

## Recommendations Made During the Reporting Period

Table 1 shows all recommendations for corrective action made during the reporting period.

Table 1

Report	Recommendation
The Identification and Mitigation Efforts for Key Position and Personnel Dependencies at the Farm Credit Administration	1 The Office of Inspector General recommends the Farm Credit Administration provide guidance to Office Directors on how to identify and mitigate key position and personnel dependencies to strengthen an Agency-wide succession program.
	2 The Office of Inspector General recommends the Farm Credit Administration analyze whether the current office structures and use of grade levels allow for proper mitigation of succession risk.
	3 The Office of Inspector General recommends the Farm Credit Administration analyze and update, rescind, or issue new guidance on training and development programs mentioned in the report, including setting forth the nomination, application, and selection criteria for leadership and executive development opportunities.
	4 The Office of Inspector General recommends the Farm Credit Administration direct each office to identify skills and abilities in their offices to understand gaps, risks, and opportunities to assist in succession management activities where such identifications have not already been performed.
	5 The Office of Inspector General recommends the Farm Credit Administration analyze whether individual development plans should be required or whether other methods could be employed to ensure that career goals, developmental opportunities, and training needs are addressed.

## In Progress

Below are the audits, inspections, and evaluations in progress at the end of the reporting period.

### Farm Credit Administration’s Telework and Remote Work Program

FCA has a telework and remote work program that provides employees the opportunity to perform their official duties at an alternate worksite. The COVID-19 pandemic changed the telework and remote work landscape, bringing renewed emphasis on continuity of operations, flexibility, and safety. The objective

of this audit is to determine whether FCA has implemented controls over the telework and remote work program and whether the process is efficient and effective.

### **Farm Credit Administration's Compliance with the Federal Information Security Modernization Act for Fiscal Year 2024**

The Federal Information Security Modernization Act of 2014 requires that the OIG annually evaluate FCA's information security program and practices to determine their effectiveness according to metrics identified by the Department of Homeland Security.

### **Farm Credit Administration's Financial Statements Fiscal Year 2024**

FCA is required annually to submit financial statements to Congress and OMB. Those financial statements must be audited in accordance with generally accepted government auditing standards by the IG or an independent external auditor, as determined by the IG. The OIG has contracted with an independent public accounting to perform this audit for fiscal year 2024. The OIG is monitoring the work of the firm.

# INVESTIGATIONS

The OIG has broad discretion to carry out investigations related to FCA programs and operations that the IG determines to be necessary or appropriate. The range of matters falling within the OIG's investigative purview is expansive, encompassing potential violations of law, rules, or regulations; mismanagement; abuses of authority; and more. Investigative activities may be initiated upon allegations or referrals received from a variety of sources, including, but not limited to, FCA employees or contractors, congressional committees, other agencies, System institutions, or members of the public. The OIG may also investigate potential fraud, waste, abuse, and mismanagement identified through OIG audits, inspections, and evaluations.

In exercising its investigative authorities, the OIG works to develop products that are timely, clear, and credible, and to guard the identities of those who provide information to the OIG or are the subject of complaints. All investigations are carried out in accordance with the CIGIE *Quality Standards for Investigations*.

Table 2 summarizes major investigative activity during the reporting period.

**Table 2**

Metric	Number
Investigative reports issued <sup>3</sup>	0
Persons referred to the U.S. Department of Justice for criminal prosecution	0
Persons referred to state and local prosecuting authorities for criminal prosecution	0
Indictments and criminal informations that resulted from any prior referral to prosecuting authorities	0

## Complaint Activity

FCA employees and others may confidentially report potential fraud, waste, abuse, or mismanagement to the OIG in-person or via telephone, email, mail, or OIG's online complaint form. Table 3 shows the disposition of complaints received during the reporting period or carried over from a previous reporting period.

**Table 3**

Action Taken	Number
Closed after investigation	0
Closed after review with no further specific investigative action	16
Referred to an FCA program manager	12
Referred to other federal, state, or local agency or authority	0
Under review at the end of the reporting period <sup>4</sup>	2
<b>Total</b>	<b>30</b>

## Required Reporting on Human Trafficking

The Trafficking Victims Prevention and Protection Reauthorization Act of 2022<sup>5</sup> requires the OIG to report on suspected violations relating to trafficking in persons; investigations resulting from those suspected

<sup>3</sup> This metric does not include memoranda memorializing the closure or referral of complaints.

<sup>4</sup> Includes all open complaints, including those under investigation at the end of the reporting period.

<sup>5</sup> Pub. L. 117-348, § 122(e) (Jan. 5, 2023).

violations, and related recommendations to improve Agency programs and operations. The OIG has no responsive information for this reporting period.

# OTHER REPORTS AND REVIEWS

The OIG also conducts reviews that do not fit the description of an audit, inspection, evaluation, or investigation. These projects are typically undertaken in accordance with a statutory requirement, for quality assurance purposes, or to otherwise provide comprehensive oversight of FCA programs and operations. Below are summaries of such reviews that were completed during the reporting period.

## Survey of Farm Credit System Institutions Regarding the Agency's Examination Function

Each quarter, the OIG surveys recently examined System institutions on the quality and consistency of FCA's examination function. Survey questions seek the institution's views on several matters, ranging from the appropriateness of the examination's scope and the examiners' conduct to the helpfulness of any recommendations or required actions. The survey employs a numerical rating system and allows for institutions to provide narrative responses as well as to call the OIG with any concerns. The OIG collects, aggregates, and anonymizes survey responses for distribution semiannually to the FCA Board and Chief Examiner.

The OIG issued a [survey report](#) on March 29, 2024, detailing responses from System institutions examined during the third and fourth quarters of fiscal year 2023 and providing cumulative survey data for the entirety of fiscal year 2023. Prior survey reports are available on the [OIG's online reports page](#).

## Charge Card Letter Fiscal Year 2023

Pursuant to the Government Charge Card Abuse Prevention Act of 2012<sup>6</sup> and implementing OMB guidance, the OIG conducts periodic risk assessments of FCA charge card programs to analyze the risk of illegal, improper, or erroneous purchases. The OIG annually reports to OMB on the Agency's progress in implementing any charge card-related recommendations.

On January 4, 2024, the OIG issued a letter to OMB reporting that there were no charge card-related recommendations initiated, closed, or open during fiscal year 2023.

## Management Challenges

As required by the Reports Consolidation Act of 2002,<sup>7</sup> the OIG annually prepares a statement summarizing what the IG considers to be the most serious management and performance challenges facing FCA. The statement also briefly assesses the Agency's progress in meeting those challenges and highlights relevant OIG oversight work.

For fiscal year 2023, the OIG highlighted four challenges facing the Agency:

- Regulating and Supervising a Complex Farm Credit System
- Innovation at FCA and the Farm Credit System



<sup>6</sup> 41 U.S.C. § 1909(d).

<sup>7</sup> 31 U.S.C. § 3516(d).

- Agility in Adapting to a Fast-changing Information Technology World
- Recruiting and Retaining a Talented and Diverse Workforce

The [report](#) was issued to the FCA Board on October 12, 2023. FCA management's response can be found in the Agency's [Performance and Accountability Report for Fiscal Year 2023](#).

### **Internal Control Review of the Office of Inspector General's Investigative Function**

In October 2023, the OIG concluded an internal control review of the OIG's investigative function. This review focused on controls designed to ensure the OIG's adherence to CIGIE standards, OIG policies and procedures, and applicable Agency policies. The review found no internal deficiencies or weaknesses but identified opportunities to improve the OIG's investigative practices.



# OUTREACH, COLLABORATION, AND OTHER INITIATIVES

## FCA Employees

The cooperation of FCA employees is essential to all aspects of OIG oversight. Accordingly, the OIG has several ongoing initiatives geared toward educating FCA employees on the OIG's mission and authorities. These include a quarterly intra-agency newsletter, the *dIG*, which spotlights the office's functions and provides recent examples of OIG oversight products government-wide. The OIG also promotes awareness of its mission and functions through presentations at public meetings of the FCA Board, its public-facing website, and distribution of posters in common areas in the Agency.

## Congress

In the interest of fulfilling its responsibility to keep Congress fully and currently informed about problems and deficiencies relating to FCA programs and operations, the OIG endeavors to respond expeditiously to all congressional requests and to periodically brief oversight committees on recent OIG activity. In January, the OIG provided briefings on its activities to majority and minority staff from the Senate Committee on Agriculture, Nutrition, and Forestry and the House Committee on Agriculture.

## Inspector General Community

The OIG is active in the IG community, with staff lending their efforts and expertise to the work of various CIGIE committees, working groups, and initiatives.

Throughout the reporting period, IG Laguarda served as Chair of the CIGIE Inspection and Evaluation (I&E) Committee. One of CIGIE's standing committees, the I&E Committee maintains professional standards for inspections and evaluations, heads the development of protocols for reviewing cross-agency management issues, and oversees the I&E peer review process. Under the purview of this committee, the OIG's Assistant Inspector General for Audits, Inspections, and Evaluations Chairs the I&E Roundtable.

The IG also served throughout the reporting period on the CIGIE Budget and Legislation Committees. The Legislation Committee fosters relationships with Congress, represents the IG community's interests on legislative initiatives, and keeps OIGs apprised of pertinent legislative developments. The Budget Committee provides leadership in the development of CIGIE's annual appropriation requests and coordinates with OMB and relevant Congressional committees on funding CIGIE activities. Finally, as Chair of the I&E Committee, IG Laguarda also sat on the CIGIE Executive Council, which assists in governance of CIGIE.

In addition to their involvement in the above-listed committees, OIG staff participated in a variety of CIGIE committees and working groups, including the Audit Committee, the Diversity, Equity, Inclusion, and Accessibility Committee, the Small and Unique IG working group, the Council of Counsels to the Inspectors General, the Assistant Inspectors General for Investigations Subcommittee, and the Whistleblower Protection Coordinators working group.

## Reviews of Proposed Legislation, Regulations, and Policies

The OIG reviews proposed and existing legislation, regulations, and policies that affect Agency programs and operations or the mission and functions of the OIG. When appropriate, the OIG makes recommendations regarding the impact of such legislation, regulations, and policies on economy or efficiency, the prevention and detection of fraud, waste, and abuse, or the integrity and independence of the OIG. This reporting period, the OIG provided input to the CIGIE Legislation Committee on proposed and existing IG reporting mandates concerning payment integrity reporting, management challenges, and the use of artificial intelligence.

# APPENDIX I: PEER REVIEWS

To ensure adherence to relevant professional standards, each OIG is subject to periodic external peer reviews. Information on peer reviews conducted by and of the FCA OIG is provided below.

Reports of external peer reviews of FCA OIG operations may be found on the [OIG's online reports page](#) and on [Oversight.gov](#). Reports of peer reviews conducted by the FCA OIG may be located on the websites of the reviewed OIGs.

## Audit

Generally accepted government auditing standards require any organization conducting audits in accordance with those standards to undergo an external peer review at least once every three years. These peer reviews conclude in a rating of *pass*, *pass with deficiencies*, or *fail*. A rating of *pass* signifies that the audit organization's system of quality control has been suitably designed and complied with to provide the organization with reasonable assurance of performing and reporting in conformity with applicable professional standards and legal and regulatory requirements in all material respects.

The FCA OIG's audit function was not subject to peer review during the reporting period. The most recent peer review was completed by the Federal Trade Commission OIG on June 9, 2022. The FCA OIG received the highest rating available, *pass*, and [the report](#) made no recommendations for corrective action.

The FCA OIG did not conduct any audit peer reviews during the reporting period.

## Inspection and Evaluation

The CIGIE *Quality Standards for Inspection and Evaluation* require members of CIGIE that conduct inspections or evaluations under those standards to undergo an external peer review every three years. For inspection and evaluation peer reviews conducted before April 1, 2024, reports did not include an overall rating (such as *pass* or *fail*) but stated whether the reviewed OIG's policies and procedures were generally consistent with CIGIE standards and whether the OIG's work generally complied with those standards.

The FCA OIG's inspection and evaluation function was not subject to peer review during the reporting period. The most recent peer review was completed by the Securities and Exchange Commission OIG on July 8, 2022. The peer review determined that the FCA OIG's policies and procedures were generally consistent with the standards reviewed and that the reports reviewed generally complied with those standards and FCA OIG policies and procedures. [The report](#) made no recommendations for corrective action.

The FCA OIG did not conduct any inspection and evaluation peer reviews during the reporting period.

## Investigation

CIGIE's *Qualitative Assessment Review Guidelines for Investigative Operations of Federal Offices of Inspector General* establish an independent external evaluation process for investigative operations. The objective of an investigative peer review is to determine whether internal control systems are in place and operating effectively to provide reasonable assurance that an OIG's investigative operations comply with CIGIE's *Quality Standards for Investigations*. Reviewed OIGs are assessed a rating of *compliant* or *non-compliant*. While the guidelines do not mandate that OIGs without statutory law enforcement authority—like the FCA OIG—undergo investigative peer reviews, they encourage voluntary participation.

The FCA OIG did not undergo an investigative peer review during the reporting period. The OIG's investigative function is scheduled to be peer reviewed in spring 2025. The [most recent peer review](#) of the FCA OIG's investigative program was performed by the Securities and Exchange Commission OIG for the one-year period ending September 30, 2007.

The FCA OIG did not conduct any investigative peer reviews during the reporting period.

## Outstanding Recommendations

There are no outstanding recommendations from any peer review conducted by another OIG that have not been fully implemented.

There are no recommendations from any peer review conducted by the FCA OIG that remain outstanding or that have not been fully implemented.

# APPENDIX II: REPORTS ISSUED

Table 4 lists all audit, inspection, and evaluation reports issued during the reporting period. For each report, Table 4 lists the dollar value of questioned costs (including the dollar value of unsupported costs), the dollar value of recommendations that funds be put to better use, and whether a management decision had been made by the end of the reporting period.

**Table 4**

Report Title	Dollar Value of Questioned Costs		Dollar Value of Recommendations that Funds be Put to Better Use	Management Decision Made by the End of the Reporting Period
	Total	Unsupported		
The Identification and Mitigation Efforts for Key Position and Personnel Dependencies at the Farm Credit Administration	\$0	\$0	\$0	Yes
Farm Credit Administration's Compliance with the Payment Integrity Information Act of 2019 for Fiscal Year 2023	\$0	\$0	\$0	Yes
Farm Credit Administration's Financial Statements Fiscal Year 2023	\$0	\$0	\$0	Yes

### Definitions

**Management Decision:** The evaluation by agency management of the findings and recommendations included in an audit report and the issuance of a final decision by management concerning its response to the findings and recommendations, including actions concluded to be necessary.

**Questioned Cost:** A cost that is questioned by the OIG because of an alleged violation of a provision of a law, regulation, contract, grant, cooperative agreement, or other agreement or document governing the expenditure of funds; a finding that, at the time of the audit, the cost is not supported by adequate documentation; or a finding that the expenditure of funds for the intended purpose is unnecessary or unreasonable.

**Recommendation that Funds be Put to Better Use:** A recommendation that funds could be used more efficiently if agency management took actions to implement and complete the recommendation, including reductions in outlays; de-obligation of funds from programs or operations; withdrawal of interest subsidy costs on loans or loan guarantees, insurance, or bonds; costs not incurred by implementing recommended improvements related to the operations of the agency, a contractor, or grantee; avoidance of unnecessary expenditures noted in pre-award reviews of contract or grant agreements; or any other savings which are specifically identified.

**Unsupported Cost:** A cost that is questioned by the OIG because the OIG found that, at the time of the audit, such cost is not supported by adequate documentation.

## APPENDIX III: OPEN RECOMMENDATIONS

Table 5 identifies recommendations made before the reporting period, for which corrective action had not been completed as of March 31, 2024, including the potential cost savings associated with the recommendation. An up-to-date list of open OIG recommendations may be found at [Oversight.gov/recommendations](https://www.oversight.gov/recommendations).

**Table 5**

Report	Recommendation	Potential Cost Savings
Farm Credit Administration's Process for Merger Activities in the Farm Credit System	1 The Office of Inspector General recommends the Office of Regulatory Policy update policies, procedures, and the merger template to reflect current systems, processes, recordkeeping, and controls for merger reviews.	\$0
	2 The Office of Inspector General recommends the Office of Regulatory Policy design and implement controls over merger files to ensure information is fully documented in an organized system.	\$0
	5 The Office of Inspector General recommends the Office of Regulatory Policy evaluate use of the Correspondence Tracking System for merger information, determine appropriate access controls, and remove legacy data for files that are no longer needed.	\$0
Farm Credit Administration's Examiner Staffing Program	1 The Office of Inspector General recommends the Office of Examination coordinate with applicable offices to gather information on how applicants found out about the FCA announcement through the application process.	\$0
The Office of Secondary Market Oversight's Examination Policies and Procedures	2 The Office of Inspector General recommends the Office of Secondary Market Oversight document examination policies and procedures unique to the examination of the Federal Agricultural Mortgage Corporation.	\$0

# INDEX OF REPORTING REQUIREMENTS

The following is an index to semiannual reporting requirements found at 5 U.S.C. § 405(b).<sup>8</sup>

Description	Page
(1) Significant problems, abuses, and deficiencies relating to the administration of FCA programs and operations and associated reports and recommendations for corrective action made by the OIG	4-6, 10-11
(2) Recommendations made before the reporting period, for which corrective action has not been completed	17
(3) Summary of significant investigations closed during the reporting period	None
(4) Convictions during the reporting period resulting from investigations	None
(5) Information regarding each audit, inspection, or evaluation report issued during the reporting period	16
(6) Management decisions made with respect to any audit, inspection, or evaluation issued during a previous reporting period	None
(7) Information described under section 804(b) of the Federal Financial Management Improvement Act of 1996	None
(8) Peer reviews conducted by another OIG	14-15
(9) Recommendations from any peer review conducted by another OIG that have not been fully implemented	15
(10) Peer reviews conducted of another OIG, including recommendations made from any previous peer review that remain outstanding or have not been fully implemented	14-15
(11) Statistical tables for investigations and referrals	8
(12) Metrics for developing investigative statistics	8
(13) Investigations involving a senior government employee where allegations of misconduct were substantiated	None
(14) Instances of whistleblower retaliation	None
(15)(A) Agency attempts to interfere with the independence of the OIG	None
(15)(B) Reports made under 5 U.S.C. § 406(c)(2)	None
(16)(A) Closed audits, inspections, and evaluations not disclosed to the public	None
(16)(B) Closed investigations involving a senior government employee not disclosed to the public	None

There were no contract audit reports issued during the reporting period that would be reportable under section 845 of the National Defense Authorization Act for Fiscal Year 2008.<sup>9</sup>

Reporting required by the Trafficking Victims Prevention and Protection Reauthorization Act of 2022<sup>10</sup> is found at page 8.

<sup>8</sup> Reflects amendments made in the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. 117-263, § 5273 (Dec. 23, 2022) to the IG Act, 5 U.S.C. app. § 5. The IG Act was recodified at 5 U.S.C. §§ 401–424 shortly thereafter by Pub. L. 117-286 (Dec. 27, 2022), but the recodification did not address the changes effected in the December 23 act.

<sup>9</sup> Pub. L. 110-181 (Jan. 28, 2008).

<sup>10</sup> Pub. L. 117-348 (Jan. 5, 2023).







Farm Credit Administration  
Office of Inspector General

## **REPORT FRAUD, WASTE, ABUSE, & MISMANAGEMENT**

**Fraud, waste, abuse, and mismanagement in government concerns everyone: Office of Inspector General staff, Farm Credit Administration employees, Congress, and the general public. We actively solicit allegations of any fraud, inefficient and wasteful practices, abuse of authority, and mismanagement related to FCA programs and operations. You can report allegations to us in several ways:**

**Online: <https://apps.fca.gov/oigcomplaint>**

**Phone: (800) 437-7322 (Toll-Free)  
(703) 883-4316**

**Email: [fca-ig-hotline@rcn.com](mailto:fca-ig-hotline@rcn.com)**

**Mail: 1501 Farm Credit Drive  
McLean, VA 22102-5090**

**To learn more about reporting wrongdoing to the OIG, please visit our website at <https://www.fca.gov/about/inspector-general>.**