

# OFFICE OF THE INSPECTOR GENERAL ANNUAL WORK PLAN | FISCAL YEAR 2022

OCTOBER 1, 2021 – SEPTEMBER 30, 2022



OFFICE *of the*  
INSPECTOR GENERAL  
U.S. GOVERNMENT PUBLISHING OFFICE

GPO

U.S. GOVERNMENT PUBLISHING OFFICE  
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GPO

# Inspector General

Conducts independent audits, evaluations, and reviews of GPO programs and operations

## Overview

Established by the Inspector General Act of 1988, the Office of the Inspector General offers an independent and objective means of keeping the Director of the GPO and Congress fully informed about problems and deficiencies relating to the agency's administration and operations. Two units are responsible for fulfilling the OIG mission: the Office of Audits and Inspections and the Office of Investigations. For more information on our structure, see our [Organization Chart](#).

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Reporting mechanism operated by the OIG that provides current and former GPO general public with an important avenue for reporting allegations of fraud, waste, related to GPO programs, operations, and personnel. If you suspect that a rule or being—or has been—violated, you are strongly encouraged to contact the

## Report or Contact the Hotline

Online Complaint Form. The form can be filled out and submitted submitted via e-mail, by fax (202.512.1352), or by U.S. Mail using the

# MESSAGE FROM THE INSPECTOR GENERAL

## U.S. GOVERNMENT PUBLISHING OFFICE

The following is our Fiscal Year (FY) 2022 Annual Work Plan (AWP). In addition to providing background information on our office such as our responsibilities and organization, it outlines the ongoing and planned work for the coming year. As with any plan, it is not a contract but rather a framework for the coming year. It is subject to constant review to account for emerging issues and priorities.

To develop this AWP, we sought input from our stakeholders in Congress and from GPO leadership and its employees. Their responses are reflected in this AWP. In total we reviewed over 17 project proposals.

The reader should understand certain principles are emphasized in GPO OIG work and are reflected in this AWP. OIG work will continue to be:

- **Proactive:** The AWP will allow for targeted efforts within the goals aimed at “proactive” inspections and investigations to advise agency leadership on how to improve practices.
- **Strategic:** Our Work Plan reflects a necessity to focus on “strategic” impact in order to make progress. We will evaluate every proposed effort across the office, including investigations, for its greatest potential advantage to the agency.
- **Team Based:** All of our efforts will be “team based.” Every inspection, audit, or investigation will have a minimum of two or more assigned members, which may reduce volume but increase merit and value.
- **Increase Quality Assurance:** Our office will continue to improve the content of its products in both substance and style to be more consistent, tailored, and well-regarded.
- **Inspector General (IG) Community Integration:** This plan is also premised on the belief that greater integration with the IG community is a benefit to my office and that the Council of the Inspectors General on Integrity and Efficiency (CIGIE) is the foundation for standards, training, and practices for my office.



Michael P. Leary  
Inspector General

## INTRODUCTION

This Annual Work Plan identifies assignment topics continuing from FY 2021 as well as projects scheduled to start during FY 2022. Our office is organized to address emerging issues and priorities from our stakeholders in GPO leadership, the public, and Congress.

Our AWP is implemented through audits, inspections, proactive investigations, and follow-up reviews executed in compliance with the Inspector General (IG) Act of 1978, the GPO Inspector General Act of 1988, and applicable professional standards of the U.S. Comptroller General, and the Federal OIG Quality Standards prescribed by the Council of the Inspectors General on Integrity and Efficiency (CIGIE).





## OUR RESPONSIBILITY AND ORGANIZATION

The **T**he OIG helps GPO effectively carry out its responsibilities by promoting economy, efficiency, and effectiveness in the administration of GPO programs and operations. Our office is also designed to prevent and detect fraud, waste, and abuse in those programs and operations. The GPO Inspector General Act of 1988, along with the Inspector General Act of 1978 as amended, establishes the authorities, responsibilities, and duties of the OIG.

The GPO OIG, located in Washington, D.C., is allocated 24 employees and is organized in three main divisions: Audits, Inspections, and Investigations. Through audits, inspections, investigations, and other oversight activities, the OIG conducts independent and objective reviews of GPO programs and operations which helps keep the Director and Congress informed of problems or deficiencies relating to the administration and operation of GPO.







## SUMMARY OF OIG'S STRATEGIC PLAN

The OIG's Strategic Plan sets forth a formal strategy for identifying priority issues and managing its work load and resources. Successful execution of this AWP is aligned with our own five year strategy and will aid the OIG in

providing the highest quality work products to our stakeholders as well as assist GPO in meeting its strategic mission, goals, and objectives. The OIG strategic plan accounts for and supports GPO's planning and current strategy.

### OUR GOALS ARE

#### Goal 1

To conduct Audits, Inspections, Management and Program Analyses, and Investigations aimed at supporting the continued viability of **GPO's business model.**

#### Goal 2

To conduct Audits, Inspections, Management and Program Analyses, and Investigations focused on assessing and improving the **GPO customer service experience.**

#### Goal 3

To conduct Audits, Inspections, Management and Program Analyses, and Investigations that promote fair, transparent, and effective contract awards, appropriate management, and deter fraud in the areas of **procurement and acquisitions.**

#### Goal 4

To transform GPO OIG into a trusted and proactive oversight organization fully integrated into the broader **IG Community** and in partnership with the CIGIE.



## ORGANIZATION

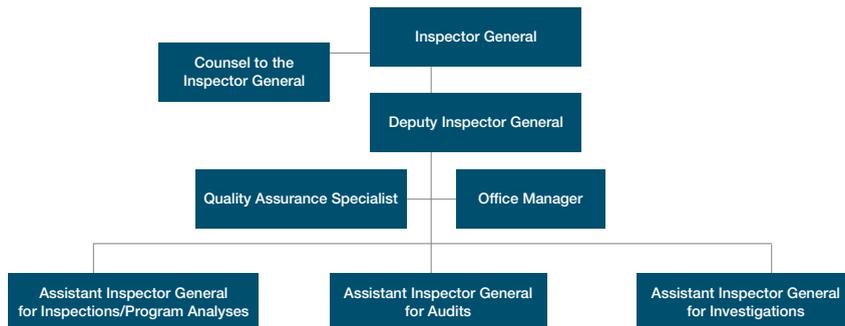
The **OIG** is based in Washington, DC and is organized as follows:

The **Inspector General** (IG) provides policy direction and leadership for the **OIG**. The IG serves as an independent voice to the Director of GPO and Congress by identifying opportunities and promoting solutions for improving GPO performance, economy, and efficiency of operations while preventing and detecting fraud, waste, and abuse.

The **Counselor to the Inspector General** provides legal advice and counsel on issues arising during audits, inspections, management and program evaluations, and investigations, including opinions regarding legal accuracy and sufficiency of **OIG** reports.

The **Audits Division** conducts independent and objective financially-related audits to improve efficiency and effectiveness of GPO programs and operations and to provide recommendations aimed at strengthening internal controls. **OIG** audits are performed in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States.

### OFFICE OF THE INSPECTOR GENERAL ORGANIZATIONAL CHART



As of October 1, 2021



The **Inspections Division** conducts proactive evaluations of GPO programs and operations to identify opportunities to improve efficiency and effectiveness. The inspections and evaluations are performed in accordance with the Quality Standards for Inspection and Evaluation issued by CIGIE.

The **Investigations Division** is responsible for conducting and coordinating investigative activity related to fraud, waste, and abuse in GPO programs and operations. The Investigations Division concentrates efforts and resources on systemic fraud investigations including possible wrongdoing by GPO contractors, employees, program participants, and others. These efforts may result in prosecution, administrative action, and monetary recoveries.

The **Quality Assurance Program** systematically evaluates all OIG products at multiple stages for quality-content and consistent style. The Program performs independent reference reviews to ensure reports are fact-checked and objective and that conclusions are reasoned and evidence-based.





# AUDIT PLAN

## FY 2021 ONGOING AUDITS

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NONE

## FY 2022 PLANNED AUDITS

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### 1. PAYMENTS TO EMPLOYEES COVERED BY THE FEDERAL EMPLOYEES' COMPENSATION ACT

The Federal Employees' Compensation Act (FECA) program provides coverage for and assistance to U.S. Government Publishing Office (GPO) employees who have sustained work-related injuries by providing appropriate monetary and medical benefits, and assistance in returning to work. The U.S. Department of Labor's (DOL) Office of Workers' Compensation Programs has the exclusive authority to administer, implement, and enforce FECA, including paying claims on behalf of injured employees. GPO reimburses DOL for its workers' compensation claim costs, including administrative fees, through a process known as chargeback billings. We will examine GPO's controls over the program paying employees who have sustained work related injuries covered by FECA.

### 2. CONTROLS OVER REVENUE-GENERATING CONTRACTS

Revenue-generating contracts are an important part of GPO's finances because they provide millions of dollars in unrestricted funds, which have no appropriation restrictions on their use. GPO reported about \$916 million in non-appropriation revenue in fiscal year 2020. We will examine GPO controls and management of revenue-generating contracts.



# AUDIT PLAN

## FY 2022 RESERVE AUDITS

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### 1. CUSTOMER SERVICES PARTNERSHIP PROGRAM

GPO produces many Federal agency information products via contracts with the private-sector. According to GPO, more than 10,000 individual firms are registered to do business with the agency. We will assess the partnership program for effectiveness and efficiency.





# INSPECTION PLAN

## FY 2021 ONGOING INSPECTIONS

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### 1. PRIVACY PROGRAM

GPO is required to protect the access to and confidentiality of personally identifiable information especially when that information is sensitive in context or nature (Social Security Numbers, legal proceedings, medical content, etc.). We are assessing the effectiveness and efficiency of the GPO's Privacy Program. We intend to determine if the Privacy Program is effectively organized, staffed, and trained to fulfill its responsibilities. We are evaluating the risk of privacy breach and existing breach mitigation procedures and evaluate key factors promoting and/or hindering the functions of the Privacy Program.

### 2. ENVIRONMENTAL PROGRAMS OFFICE, PROCESSES AND PROCEDURES TO ADDRESS ENVIRONMENTAL VIOLATIONS

GPO's Environmental Programs Office formulates GPO-wide environmental policies and guidelines to ensure compliance with environmental laws and regulations. On September 11, 2018, GPO received notification of alleged violations resulting from an U.S. Environmental Protection Agency (EPA) inspection conducted at GPO's Washington D.C. location on July 11-14, 2016, and was cited a civil penalty of \$140,000. Subsequent civil penalties were also imposed by the D.C. Department of Energy & Environment (DOEE) for a total of \$11,000. We are evaluating if GPO is addressing identified violations and determining if the Environmental Programs Office is effectively organized, staffed, and trained to fulfill its responsibilities.



# INSPECTION PLAN

## FY 2021 ONGOING INSPECTIONS (CONTINUED)

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### 3. GPO ORGANIZATIONAL TRANSFORMATION EVALUATION

GPO has been the subject of several human capital reviews and inspections of its programs, practices, and processes aimed at transitioning GPO from an entirely paper-based printer to a modern, digital and paper publisher. We are evaluating GPO's organizational transformation to assess if GPO is meeting its goal of *Keeping America Informed in the Digital Age*. We contracted with a vendor that has the requisite expertise to conduct this inspection.





# INSPECTION PLAN

## FY 2022 PLANNED INSPECTIONS

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### 1. TOP TEN SAFETY HAZARDS

Each year GPO conducts safety assessments on all GPO facilities. The results of the assessments are published in the Physical Security and Safety Assessment reports. When the last assessment of the year is complete, an updated list of the Top 10 Safety Hazards is published. We will evaluate how GPO is addressing the Top 10 Safety Hazards, to include whether GPO's Facility Division has sufficient resources.

### 2. CUSTOMER SERVICES MARKETING AND OUTREACH RETURN ON INVESTMENT

Customer Services is the business unit within GPO that provides a comprehensive suite of electronic and publishing-related products and services for Federal agency customers. As such, the unit engages in significant outreach activities designed to generate new business and growth. These activities are articulated in a plan, which includes efforts designed to reach customers during the COVID-19 pandemic. We will evaluate the effectiveness of these activities.

### 3. 2020 SURVEY FOLLOW-UP AND GPO'S COVID-19 RESPONSE

In August 2020 we conducted a two-part survey of GPO's workforce to provide GPO management with feedback on how COVID-19 impacted each employee. The survey focused on operations and safety protocols and GPO's approach to working from home. The results revealed that overall, GPO employees were satisfied with the Director's communication, employees were mostly satisfied with the safety protocols implemented, and employees were satisfied with the technical telework resources and IT-support provided. We will conduct a follow-up survey of GPO's approach to working from home to include IT support, equipment, and communications.



# INSPECTION PLAN

## FY 2022 RESERVE INSPECTIONS

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### 1. COMPREHENSIVE IT SECURITY AND PENETRATION TESTING OVERSIGHT

Federal agencies should develop, document, and implement agency-wide programs to provide information security. GPO has an information security program based on federal best practices identified by the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF). Penetration testing is one method used to determine agency IT security effectiveness, verify compliance with information security requirements, and validate agency implementation plans designed to mitigate associated threats and vulnerabilities. In 2019, the OIG transferred the penetration testing and other IT security compliance responsibilities back to the agency. As part of our ongoing oversight activities, we will assess GPO's use of the Cybersecurity Framework and evaluate the management and effectiveness of GPO's penetration testing efforts.





## INVESTIGATIVE PLAN

**T**he Investigations Division’s primary responsibilities include conducting criminal, civil, and administrative investigations involving fraud, waste, and abuse in GPO programs and activities; investigating allegations of serious misconduct by GPO employees and contractors; interfacing with the Department of Justice on OIG-related criminal and civil matters; and coordinating investigations and OIG initiatives with other federal and state agencies. They also participate in OIG outreach programs by providing fraud awareness briefings to educate agency employees and external organizations on potential indicators of fraud and the OIG’s role and responsibilities in addressing these matters.

In FY22, the Investigations Division will continue to focus on proactive investigations of significant fraud and allegations of serious employee or contractor misconduct. Planned proactive work will include collaboration with other OIG Divisions; GPO site visits; outreach with GPO management and staff; and data analysis to identify potential fraud. The Investigations Division will also collaborate with other Offices of Inspectors General to explore potential joint efforts involving GPO equities and activities.

Investigations are initiated in accordance with the OIG Strategic Plan for 2020–2024 and in consideration of prosecutorial guidelines established by local U.S. Attorney Offices. OIG investigations adhere to the Attorney General Guidelines and the CIGIE Quality Standards for Investigations, as well as federal statutes and regulations.

Investigative efforts may lead to criminal convictions and/or civil, and administrative remedies. Investigations are initiated as a result of allegations or referrals from private citizens; audits, evaluations, and inspections; GPO employees and contractors; Congress; other federal, state, and local law enforcement agencies; and proactive efforts directed at areas bearing a high potential for systemic fraud, waste, and abuse. The Investigations Division documents the results of all of its investigative activities and findings in the form of memoranda, Reports of Investigation, and/or management referrals. The various reporting formats are also used to distribute investigative reports to stakeholders as appropriate.



## **REPORT FRAUD, WASTE, AND ABUSE**

Report violations of law, rules, or agency regulations, mismanagement, gross waste of funds, abuse of authority, danger to public health and safety related to GPO contracts, programs, and/ or employees.

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