

**FALL 2021** 



# SEMIANNUAL REPORT TO CONGRESS

April 1, 2021-September 30, 2021



This report is available on our web site: https://www.gpo.gov/who-we-are/our-agency/inspector-general/semiannual-reports-to-congress

710





# **ABOUT THE GOVERNMENT PUBLISHING OFFICE**

The U.S. Government Publishing Office (GPO) was established in 1861 and is the Federal Government's primary resource for producing, procuring, cataloging, indexing, authenticating, disseminating, and preserving the official information products of the U.S. Government in both digital and tangible formats. GPO is responsible for producing and distributing informational products and services for all three branches of the Federal Government, including U.S. passports for the Department of State as well as official publications of Congress, the White House, and other Federal agencies. In addition to publication sales, GPO provides for permanent public access to Federal Government information at no charge through *GovInfo.gov* and via partnerships with libraries nationwide participating in the Federal Depository Library Program.

# ABOUT THE OFFICE OF THE INSPECTOR GENERAL

The GPO Office of the Inspector General (OIG) helps GPO carry out its responsibilities by promoting economy, efficiency, and effectiveness in the administration of GPO programs and operations. Our efforts are designed to prevent and detect fraud, waste, and abuse in those programs and operations.

The GPO Inspector General Act of 1988, 44 U.S.C. §§ 3901-3903, along with the Inspector General Act of 1978, as amended (IG Act), 5 U.S.C. App., establishes the responsibilities and duties of the OIG. The Legislative Branch Inspectors General Independence Act of 2019 enhanced the OIG's independence and expanded our office's duties by, among other things, granting us independent law enforcement authority.

The OIG, located in Washington, D.C., is allocated 24 employees (currently staffed at 20) and is organized in three main divisions: Audits, Inspections, and Investigations. Through audits, inspections, investigations, and other activities, the OIG conducts independent and objective reviews of GPO programs and operations in order to help keep the Director, Congress, and the public informed of problems or deficiencies relating to administering and operating GPO.

# **MISSION/VISION/VALUES**

## **OUR MISSION**

To prevent fraud, waste and abuse, and improve agency efficiency and effectiveness. Provide insight into GPO programs and operations to stakeholders through independent and objective oversight.

# **OUR VISION**

Our work offers value that helps GPO improve. Based on transparency, communication and trust, OIG stakeholders—GPO, Congress, and the public—welcome and respect our products and services.

### **OUR VALUES**

#### PROFESSIONALISM

We belong to a community dedicated to the highest standards and practices. We hold ourselves accountable.

#### OBJECTIVE

We conduct our work with fairness and free from bias. We base our findings and recommendations on reliable and verifiable evidence.

#### INDEPENDENT

The core value of our work stems from the freedom to offer counsel unencumbered by external pressure or undue influence.

#### RELEVANT

All of our work is focused on supporting GPO to accomplish its mission and considers our stakeholders' concerns and priorities.

#### **ETHICAL**

We perform our work through a principled, diligent, and reliable practice that engenders trust.





# **INSPECTOR GENERAL MESSAGE**



I am pleased to present this U.S. Government Publishing Office (GPO) Office of the Inspector General Fall 2021 Semiannual Report to Congress (SARC). My office continues to successfully navigate the obstacles of the pandemic to conduct oversight activities for our stakeholders that are both productive and useful. Over the past six months, my office has successfully kept its commitment to focus on production across all lines of business to include a significant outreach effort to our stakeholders both virtually and when safe, in person. We published additional audit, inspection, and investigation reports, and initiated new oversight activities; including projects that addressed the agency's environmental program, Congressional detailees, Suspension and Debarment Program as well as the Agency's Capital Investments and Priority Projects.

This report continues our comprehensive focus on the return on investment (ROI) for all of our work. As we begun in the last Spring's SARC, this semiannual report, as well as all of our reports communicate a standard, relatable self-assessment of the specific value of each effort undertaken by our office.

We also continued to implement the mandate of the Legislative Branch Inspectors General Independence Act of 2019 to strengthen our independence by, among other things, seeking a separate budget appropriation through correspondence with Congressional staff in February 2021, a copy of which was included in GPO's Fiscal Year (FY) 2022 budget justification. I will continue to explore the efficacy of this with both the Agency and Congress.

In my role as the Vice Chair of CIGIE's Inspections and Evaluation Committee I continue to further the IG community's effort to improve standardizing inspections and articulate ROI.

Finally, I continue to have regular interactions with our Congressional oversight and appropriations committees. In July, we hosted Ranking Member Rodney Davis, Committee on House Administration, as part of his visit to GPO. Keeping Congress fully and appropriately informed while maintaining a necessary independence is an enduring focus. To that effect, I remain available and willing to participate in any hearings on the specific work of my office.

Michael P. Leary Inspector General



# TABLE OF CONTENTS

ABOUT THE GOVERNMENT PUBLISHING OFFICE	I
ABOUT THE OFFICE OF THE INSPECTOR GENERAL	I
MISSION/VISION/VALUES	II
INSPECTOR GENERAL MESSAGE	IV
TABLE OF CONTENTS	VI
SELECTED STATISTICS AND HIGHLIGHTS	1
RETURN ON INVESTMENT	2
LIST OF NON-MONETARY BENEFITS	3
AUDITS	4
GPO CAPITAL INVESTMENTS, REPORT NUMBER 21-10, AUGUST 20, 2021	4
GPO EMPLOYEES DETAILED TO CONGRESS, REPORT NUMBER 21-11, SEPTEMBER 17, 2021	5
INSPECTIONS	6
REVIEW OF THE GPO SUSPENSION AND DEBARMENT PROGRAM, REPORT NUMBER 21-09, JULY 6, 2021	6
REVIEW OF GPO PRIORITY PROJECTS, REPORT NUMBER 21-12, SEPTEMBER 30, 2021	7
INVESTIGATIONS	8
INVESTIGATIONS	
	9
STRATEGIC PERFORMANCE OVERVIEW	9 12
STRATEGIC PERFORMANCE OVERVIEW	9 12 13
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15 16
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15 16 19
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15 16 19 20
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15 16 19 20 22
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15 16 19 20 22 22
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15 16 19 20 22 22 22
STRATEGIC PERFORMANCE OVERVIEW	9 12 13 15 16 19 20 22 22 22 24 25



# SELECTED STATISTICS AND HIGHLIGHTS

Audits
Audits Reports Issued
Inspections
Inspections Reports Issued2
Investigations
Complaints Opened1
Complaints Closed3
Investigative Cases Opened0
Investigative Cases Closed4
Subpoenas Issued0
Referrals to GPO Management6
Recommendations
Recommendations Opened16
Recommendations Closed1

# **RETURN ON INVESTMENT**

Return on Investment (ROI) is a commonly used profitability ratio that measures the amount of return, or profit, an investment generates relative to cost.<sup>1</sup> The ROI for an OIG is the most quantifiable metric of performance and considers the cost of doing business and the revenues it collects.<sup>2</sup> The reporting requirements of the Inspector General Act of 1978, as amended, prioritize quantitative results rather than qualitative work. Therefore, Inspectors General may be inclined to focus on metrics that may not accurately reflect the most pressing matters at the agency they oversee.<sup>3</sup> This can lead to a misplaced emphasis in the work of an OIG, because it focuses on money lost, whereas much of the value of an OIG comes from money saved, or better yet, value gained, *i.e.*, proactive savings versus reactive losses.

For OIG work, ROI is usually defined in terms of monetary impact and savings associated with audits, investigations, and other actions that allow the Government to recoup funds owed, correct practices to ensure more efficient spending, and prevent misappropriation of funds.<sup>4</sup> Examples of these type of monetary benefits are included in the appendices to this report and in some cases are required by law to be reported. While dollar value is the traditional baseline for ROI, there are other quantitative and qualitative ways to show positive impact on an agency – that is, to expand the definition of "value." Examples of ways to measure value can be in savings over time, better decision making and reporting, increased level of service, and timely regulatory compliance.<sup>5</sup>

Inclusion of this expanded concept of ROI in reporting to GPO, Congress, and the public is important to OIG operations because although difficult to measure, determining non-monetary ROI impacts and benefits allow the OIG to show value to the agency and identify areas where dollar savings potential is possible. The results and impact of OIG work can oftentimes provide an alternative to the traditional monetary ROI and give flexibility to develop tailored approaches for determining efficiency, effectiveness, or sustainability of agency operations, or improving programs or policies. Examples of non-monetary or nontraditional benefits are listed on the next page.

<sup>&</sup>lt;sup>1</sup> Speights, "Return on Investment: What to Expect", *The Motley Fool* (Mar. 17, 2021), available at: https://www.fool. com/investing/how-to-invest/stocks/good-return-on-investment/

<sup>&</sup>lt;sup>2</sup> Hudak and Wallack, "Sometimes cutting budgets raises deficits: The curious case of inspectors general return on investment", *Center for Effective Public Management at Brookings* (April 2015), available at: https://www.brookings.edu/wp-content/uploads/2016/06/CEPMHudakWallackOIG.pdf

<sup>&</sup>lt;sup>3</sup> Letter to Senator Johnson, Senator Peters, Representative Cummings, and Representative Jordan, from ACORN8, Government Accountability Project, National Taxpayers Union, Project on Government Oversight, Public Citizen, R Street Institute, and Taxpayers Protection Alliance (May 16, 2019), available at: https://www.rstreet.org/wp-content/ uploads/2019/05/Bipartisan-Coalition-Support-Letter-for-IG-reform.pdf

<sup>&</sup>lt;sup>4</sup> IBID.

<sup>&</sup>lt;sup>5</sup> "Calculating Non-Traditional Return on Investments", VUEWorks (Feb. 26, 2018), available at: https://www.vueworks.com/calculating-non-traditional-return-on-investments/

# LIST OF NON-MONETARY BENEFITS

- **01)** Improve management controls
- 02) Improve systems and processes
- 03) Avoid violations of law or regulation
- 04) Validate existing processes
- 05) Initiate best business practices
- 06) Provide analysis and data to decision makers
- 07) Improve safety, morale, health, and security
- **08)** Ensure compliance with a prescribed standard
- **09)** Enhance stakeholder confidence
- 10) Other

Reporting non-monetary/non-traditional ROI is an iterative process and will continue to evolve in future Semiannual Reports to Congress. For this report, in the OIG division specific sections, we provide a narrative of each project's ROI with a summary of the OIG's ROI provided in appendix A.

# AUDITS

The Audits Division helps improve the management of GPO programs and activities by providing timely, balanced, credible, and independent financial and financially-related audits that address the economy, efficiency, and effectiveness of GPO operations. Audit reports identify opportunities for enhancing management of program operations and provides GPO with constructive recommendations to improve its services. OIG audits are performed in accordance with Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States.

# GPO Capital Investments, Report Number 21-10, August 20, 2021

The objective was to determine whether GPO's capital investment process reflected sound business practices in selecting capital investments to fund, and whether investments met GPO's strategic goals. Capital investments include assets such as structures, equipment, and information technology (including software) which are used by GPO and have an estimated useful life of two or more years. Capital assets may be acquired in different ways: through purchase, construction, or manufacture. They include not only the assets as initially acquired but also additions, improvements, modifications, and replacements outside of ordinary repairs and maintenance.

We identified that GPO's process did not ensure that adequate non-financial or financial details for capital investment proposals were consistently required or reviewed which inhibited transparent and objective assessment. We also identified that GPO did not require Business Units to perform post-implementation reviews of capital investments to determine whether investments were completed on schedule, came within budget, and provided the intended benefits. Further, GPO did not clearly define prioritization and ranking factors for business cases received from the Business Unit.

We did find that GPO incorporated best practices from the Government Performance and Results Modernization Act of 2010 in its policy to ensure the agency's operations, investments, priorities, and resources are in support of GPO's mission, vision, and strategic goals.

*Recommendations:* The report recommended that GPO improve its evaluation and selection process of capital investments related to business case data and analysis; post-implementation reviews; ranking and prioritizing business cases; investment committee resources; and documentation and retention of capital investment activities. We also recommended GPO to review two outdated GPO Directives and update them, as appropriate.

Return on Investment: Developing guidance and implementing new procedures that are more in line with Federal agencies' practices identified in this report would provide GPO decision makers the analysis and data to objectively evaluate and prioritize competing investment proposals. Implementing best business practices of performing post-implementation reviews will help GPO determine whether the investment was completed on schedule, on budget, and provided the intended benefits. Ultimately, sound decision making and project tracking ensures that investments are 1) aligned to the agency's strategic priorities, 2) effectively managed to maintain cost and performance, and 3) investments are as fiscally sound as possible.

#### GPO Employees Detailed to Congress, Report Number 21-11, September 17, 2021

The objective was to assess the GPO Congressional Detailee Program; specifically, workhours administration. Congress established annual Congressional Publishing Appropriations to cover the costs of authorized publishing activities, including the costs of employees detailed to Congress as authorized by provisions in chapters 7 and 9 of Title 44 of the United States Code. Upon receiving congressional requests, GPO assigns selected employees to serve on temporary assignments.

We identified that GPO's internal workflows related to this program rely on extensive manual processes and lack adequate controls. These weaknesses resulted in GPO incurring at a minimum \$174,234 in revenue loss from annual Congressional Publishing Appropriations. GPO also at a minimum overbilled two congressional committees for \$110,580 and underbilled two other committees for the same amount. We also identified that GPO did not leverage available automated technologies to record workhours for billing purposes. In addition, we found that GPO lacked policies and procedures for the Congressional Detailee Program. Further, we identified that GPO did not require detailees to record and validate their own work and leave hours in the system.

**Recommendations:** The report recommended that GPO remedy the revenue loss and correct inaccurate billings to Congress; review detailee workhours not included in the audit; establish policies and procedures for the program; leverage available automated GPO technologies to manage the program; and require detailees to validate their own work and leave hours.

*Return on Investment:* When fully implemented, our recommendations will remedy future lost revenue like we saw with \$174,234 in revenue loss, improve

management and system controls, as well as enhance stakeholder confidence. For example, performing management reviews would ensure completeness of workhour data received, input, and billed to Congress. Establishing policies and procedures and ensuring employees consistently follow them could improve productivity, efficiency, and customer experience. Leveraging automated technologies to manage detailee program would mitigate missing and inaccurate workhour information and improve confidence in the data used to bill Congress for detailed employees. In addition, there is a high likelihood that once the agency completes Recommendation #2, more revenue losses will be identified and potentially recovered.



# INSPECTIONS

The Inspections Division conducts proactive inspections of GPO programs and operations to identify opportunities to improve efficiency and effectiveness. These inspections are systematic and independent assessments of the design, implementation, and/or results of GPO's operations, programs, or policies. They provide information that is timely, credible, and useful for agency managers, policymakers, and others. The GPO OIG's inspections are performed in accordance with the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

Review of the GPO Suspension and Debarment Program, Report Number 21-09, July 6, 2021

We reviewed GPO's Suspension and Debarment Program's overall process and associated timelines, as well as the effectiveness of the notification of debarments inside and outside of GPO. Suspension and debarment are tools designed to protect the federal government from potential harm posed by individuals or business entities, such as vendors and contractors, whose conduct indicates a lack of honesty, integrity, or poor performance. Suspended and debarred contractors are excluded from procurement activities.

We found that GPO can improve its suspension and debarment process by adopting federal best practices, such as updating policies and directives, by training staff on the suspension and debarment process, and using a case management tool. While the appointment of a permanent Suspension and Debarment Official (SDO) was a positive step, GPO can further improve by appointing a senior accountable official to administer the day to day management of the Suspension and Debarment Program. In addition, while GPO is not required to follow the Federal Acquisition Regulation (FAR), adopting FAR Subpart 9.4, Debarment, Suspension, and Ineligibility could negate the effects of outdated directives and codify a practice to which some GPO staff already adhere. Adopting federal best practices would decrease the likelihood that GPO could be defrauded. We also found that GPO can improve its timeliness in adjudicating suspension and debarment referrals by establishing and adhering to decision point timeframes. Finally, GPO can improve its internal Exclusion List management and transparency, as well as the accuracy of the information provided government wide, by updating internal controls and policies to include quality control checks.

**Recommendations:** We made five recommendations to improve GPO's Suspension and Debarment Program. The recommendations focused on best practices such as having trained staff and current polices, establishing suspension and debarment baseline timeframes, and using a case management tool. GPO concurred with one recommendation, partially concurred with three recommendations, and nonconcurred with one recommendation. Nevertheless, GPO's proposed actions were generally responsive to the recommendations.

*Return on Investment:* When fully implemented, our recommendations will improve management controls, program results, and systems and processes, as well as initiate best practices. For example, appointing a senior accountable official responsible for suspension and debarment program management activities will provide oversight and can promote program continuity and continuous review and improvement. Implementing a case management tool or other system will help improve the timeliness of suspension and debarment activities and maintain associated records to document decisions. Adopting the FAR Subpart 9.4 will align GPO's suspension and debarment program with the majority of the federal government. Establishing timeframes for processing suspension and debarment activities will set a standard from which to identify variations, and encourage timely review of information to protect the government from potential harm posed by individuals or business entities whose conduct indicates a lack of honesty, integrity, or poor performance. Performing quality control activities will ensure issues are identified early, and information is accurate for all users of the information. Updating guidance to ensure that SAM and the Exclusion List are reviewed both after opening bids or proposals and immediately before awarding contracts will help protect the government from potential harm posed by individuals or business entities whose conduct indicates a lack of honesty, integrity, or poor performance.

#### Review of GPO Priority Projects, Report Number 21-12, September 30, 2021

We conducted an ad-hoc review of GPO's Priority Projects to assess how they are connected to GPO's strategic planning, as well as the status of each of the Priority Projects. GPO's priority project list was initially instituted as a reflection of the Director's priorities. Priority programs and projects are generally initiated and/or carried out by GPO business units. New projects are added to the list and completed projects are removed from the list. Overall, we found that while GPO has a directive to develop its strategic plan, GPO does not have directives or guidance for the Priority Projects. Without guidance and a defined process for the Priority Projects, there is a significant risk that GPO's investments are not aligned to its strategic plan..

*Considerations:* We asked GPO to consider updating strategic planning directives; establishing guidance to define, create, manage, monitor, and assess Priority Projects; ensuring documentation to support identifying a project as a Priority Project and its expected end product; and clearly prioritizing, or ranking, the order of the Priority Projects.

**Return on Investment:** Developing guidance and implementing a process to establish GPO's Priority Projects, in alignment with its strategic plans and capital investments, will aid in the articulation of the Director's strategic vision and decisions. Through these efforts, GPO can clearly identify how Priority Projects are developed, approved, and assessed following completion. These considerations will strengthen GPO's ability to provide updates to stakeholders. This will also help confirm if GPO is positioned to attain its strategic goals through the Priority Projects, and to identify needed adjustments to attain those strategic goals. Furthermore, solidifying the Priority Projects process aims to support the continued viability of GPO's business model, increase oversight and involvement by agency leadership, and ensure appropriate management of GPO funds.



# INVESTIGATIONS



The Investigations Division is responsible for conducting and coordinating investigative activities related to fraud, waste, and abuse in GPO programs and operations. While concentrating efforts and resources on major fraud investigations, activities investigated may include possible wrongdoing by GPO contractors, employees, program participants, and others who commit crimes against GPO. Through prosecution, administrative action(s), and monetary recoveries, these investigations promote integrity, efficiency, and accountability.

The Investigations Division consists of a cadre of senior special agents who are duly appointed federal criminal investigators with statutory authority to carry firearms, make arrests, execute search and seizure warrants, and perform other law enforcement duties. These agents work collaboratively with OIG auditors and inspectors as well as other law enforcement partners to enhance the effectiveness of its work. To ensure continued operational quality, the Investigations Division created an internal quality assurance team responsible for conducting reviews of reportable investigative products and other operational areas, supporting their compliance with required professional standards.

Since March 2020, the OIG has worked under COVID-19 restrictions and authorized maximum telework flexibilities. The Investigations Division has ensured the continuity of investigative operations through the utilization of video conferencing software, as well as in-person interviews, and information gathering, as needed. Additionally, the Investigations Division provides physical office coverage with the assignment of a weekly duty agent.

# STRATEGIC PERFORMANCE OVERVIEW

#### OIG Internal Programmatic Development

During FY21, the Investigations Division continued to assess internal programs and operations to identify opportunities for improvement in the division, with an emphasis operating in a cost-effective manner to accomplish goals and ensuring the safety and welfare of the staff. An example of this effective and efficient approach was the self-developed periodic refresher training that enabled agents to comply with professional requirements and overcome training limitations resulting from the COVID-19 crisis. By localizing this important training, working with other OIG law enforcement divisions, and capitalizing on GPO OIG resources, the Investigations Division realized significant cost savings and satisfied the CIGIE and Attorney General guidelines.

#### **OIG Hotline**

The GPO Inspector General Act of 1988, provides for the OIG to receive and investigate allegations involving potential violations of law, rules, or regulations, mismanagement, gross waste of funds, or abuse of authority. The OIG receives this information via email, telephone, mail, employee drop-box, and walk-ins. These are referred to collectively as "Hotline" intakes. The Investigations Division reviews these allegations to determine whether the complaint should be the subject of an investigation, audit, inspections, or referred to the GPO or another entity. During the reporting period, the Investigations Division received a total of 20 Hotline intakes.

Item(s)	No.
Hotline Intakes Open at the Beginning of the Reporting Period	1
New Hotline Intakes Received During the Reporting Period	20
Hotlines Closed (no further action) <sup>7</sup>	8
Hotlines Closed (referred to other OIG Division)	4
Hotlines Closed (referred to GPO management)	6
Hotlines Closed (referred to other law enforcement)	0
Hotlines Closed (referred to other agency)	1
Hotlines Converted to Preliminary Inquiries	1
Hotlines Converted to Complaints	1
Hotlines Converted to Investigations	0

#### Summary of OIG Hotline Intakes<sup>6</sup>

<sup>&</sup>lt;sup>6</sup> Metrics for developing data for reported statistics were obtained from OIG's Case Management Tracking System.
<sup>7</sup> Hotlines that are outside of OIG purview, nuisance, or erroneous.

# **DISTRIBUTION OF HOTLINE INTAKES TO THE OIG®**



#### **Preliminary Inquiries**

To effectively allocate OIG's investigative resources, assessing the merits of received allegations is of paramount importance. Consequently, there are matters considered for potential action but there is insufficient information to justify an investigation. To address the challenge, the Investigations Division conducts preliminary inquiries. These inquiries generally focus on collecting and analyzing additional data intended to strengthen the OIG's decisional basis. During this reporting period, the OIG opened one preliminary inquiry and closed two inquiries.

#### **Investigative Activity**

The GPO OIG Investigations Division conducted a joint criminal investigation with the Defense Criminal Investigative Service. The Investigations Division was able to conduct field operations supporting this joint criminal investigation, as described below, despite ongoing COVID-19 restrictions. Joint OIG efforts in this case helped the recovery of \$48,258 in restitution and other fines imposed at the time of sentencing. Also, of note, in the prior reporting period the OIG submitted a Management Implication Report (MIR) to the agency identifying weaknesses in the management practices of direct-mail contracts and made one recommendation to prevent potential fraud recurrence. To date, the recommendation made to the agency is still open.

<sup>&</sup>lt;sup>8</sup> Besides using the IG Hotline email, allegers have also sent allegations directly to the email accounts of OIG staff.

#### Featured Case: Theft of Government Property (20-0001-I)

On March 11, 2020, a commercial vendor notified the OIG that products purchased from a GPO managed contract were being sold on eBay. The commercial vendor's security department identified the individual selling the products as an employee of the Department of Defense (DoD). The OIG and Defense Criminal Investigative Service (DCIS) conducted a joint investigation and determined that the DoD employee was selling sophisticated printing supplies on eBay that were purchased by DoD from a GPO managed contract. The GPO OIG and DCIS conducted joint surveillance operations, undercover buys, and numerous reviews of records and financial transactions. The total loss to the government from the subject's fraud scheme totaled approximately \$48,258. On May 11, 2021, the subject plead guilty to violating 18 USC 641, Theft of Government Property, by stealing and selling toner, ink cartridges, and other commercial grade printer supplies on at least 100 occasions between May 2016 through September 2020. On September 16, 2021, the DoD employee was sentenced to two years supervised probation with four months of home confinement and restitution in the amount of \$48,258.

Return on Investment: The investigative work and case results helped the GPO protect the integrity of its procurement program and its reputation as a fiscally responsible government agency. Specifically, the criminal conviction obtained in this matter can be instrumental in the decision process for the GPO officials, when determining to debar the subject and prevent his/her access to governmental procurement processes in the future. Having awareness of this type of criminal activity can help prevent future activity from bad actors. Additionally, the criminal remedies and sentence imposed help GPO maintain its reputation as a reliable contract broker and good steward of the tax payer's money.



Lastly, the investigative work provided critical insight(s) on how the convicted subject developed and executed a fraud scheme that put agency equities at risk. The lessons learned provide added value to GPO decisionmakers on how to improve preventative measures and management controls of GPObrokered contracts and related products.

*Status:* This case is closed pending final action.

# **OTHER INFORMATION**

Significant Revised Management Decisions<sup>9</sup>: None.

Significant Management Decision with which the Inspector General Disagreed: None.

Audits, Inspections, and Investigations involving Senior Government Employees that were Not Disclosed to the Public or Where Allegations of Misconduct Were Substantiated: None.

All product titles are listed on: https://www.gpo.gov/who-we-are/ouragency/inspector-general

Where possible, the reports are also posted at www.oversight.gov.

Whistleblower Retaliation Investigations: None.

Instances of GPO Refusing to Provide Information or Assistance or Interfering with the OIG's Independence: None.

#### Statutory Certification

In accordance with the Legislative Branch Inspectors General Independence Act of 2019, as codified in 44 U.S.C. § 3903(c) (3), the Inspector General certifies that the GPO OIG has adequate safeguards and management procedures in place to ensure that the Investigations Division is in compliance with the standards established by the Council of the Inspectors General on Integrity and Efficiency, which incorporate Department of Justice guidelines, to ensure proper exercise of the statutory law enforcement authority granted under section 3903.

Review of Legislation and Regulations: None.



<sup>&</sup>lt;sup>9</sup> Since the Joint Committee on Printing exercises certain management functions over GPO and by extension, the GPO OIG, where applicable, it may be included in references to "Management."

# OIG OUTREACH

During FY21, we initiated outreach activities to inform stakeholders about the OIG's mission, processes, and operations; in addition, we wanted to learn more about GPO's mission and operations to provide better and more comprehensive oversight of GPO's programs and operations.

#### GPO Leadership and Business Unit Roundtables

This year we met with the GPO Director, his leadership team, and each of the Business Unit Directors to have informal discussions on operations and strategic plans. The goal was to better understand GPO which ultimately results in better oversight. In all we met with 12 business units and seventy GPO leaders.

#### Fraud Detection and Prevention Training

We initiated outreach activities to inform stakeholders about the OIG's authority to provide oversight of GPO's programs and operations. To that end the Investigations Division, along with the Audits Division, provided fraud awareness and detection trainings to GPO business units managers, employees, and contractor personnel. Overall, we conducted 14 training events reaching 395 employees within the different GPO business units.

Sessions	Business Units/Sites	Dates	Attendance
1	Customer Services	4/22/2021	45
2	Acquisition Services	4/27/2021	15
3	Customer Services (make-up)	5/5/2021	30
4	Laurel Warehouse Site Visit	5/13/2021	13
5	Security Services	5/26/2021	15
6	Publication and Info Sales Library Services Cont. Mgmt	6/9/2021	40
7	Chief Financial Officer (make-up)	6/23/2021	70
8	Publication and Info Sales (make-up)	7/7/2021	25
9	Library Services Cont. Mgmt (make-up)	7/7/2021	25
10	Human Capital and Equal Employment Office	7/21/2021	25
11	Information Technology and Administrative Services	8/4/2021	60
12	Security and Intelligent Documents	8/18/2021	19
13	General Counsel and Labor Relations	9/1/2021	12
14	Program Strategy and Technology, PublicRelations, and Congressional Relations		26
Total			395

Sessions will continue into the next reporting period.

#### **GPO Site Visits**

When I became the IG in April 2019, I committed to visiting each GPO site, an activity that the pandemic put on hold in 2020 and half of 2021. I am pleased to say that we restarted the site visits over the Summer and will continue through May of 2022 if all goes as planned. The focus of each visit continues to evolve as GPO navigates its regional presence in light of the continuing pandemic.

I personally visited the GPO Distribution Center in Laurel, MD followed and my team followed shortly after with a full site visit. In addition, my Deputy Inspector General led a visit to the Pueblo Distribution Center, Pueblo CO as well as the Denver, CO Customer Services site in September. Other members of my team also visited the Columbus, OH in September and are currently planning the Atlanta, GA visit.

My intent is to publish an omnibus site visit report at their completion barring any issues that warrant immediate reporting.



#### GPO Customer Services Nationwide Procurement Offices

# PEER REVIEW RESULTS

The following meets the requirement under section 5(a) (14)-(16) of the IG Act that Inspectors General include peer review results in each Semiannual Report to Congress. Federal audit and inspection functions can receive a rating of "pass," "pass with deficiencies," or "fail." Federal investigation functions can receive a rating of "compliant" or "noncompliant."

Peer review reports are posted on our website at:

https://www.gpo.gov/who-we-are/ouragency/inspector-general/plans-andreports

#### Peer Review of GPO-OIG Audit Function

The GPO OIG did not have any peer reviews of its audit function during this reporting period.

#### Peer Review of GPO OIG Inspections Function

The GPO OIG did not have any peer reviews of its inspections function during this reporting period.

#### Peer Review of GPO OIG Investigative Function

The GPO OIG did not have any peer reviews of its investigative function during this reporting period.

#### Peer Reviews Conducted by GPO OIG

We completed a Modified Peer Review of the Appalachian Regional Commission (ARC OIG) on September 30, 2021. The Modified Peer Review is applicable to OIGs that did not or do not conduct GAGAS engagements but may maintain audit policies and procedures in anticipation of conducting the work. OIGs covered by the Modified Peer Review do not receive a rating.



# APPENDIX A. NON-MONETARY RETURN ON INVESTMENT

#### Non-Monetary Return on Investment for Reports Issued in Reporting Period

Audits: Non-monetary Impact and Benefits			
Audit Reports	Government Publishing Office Capital InvestmentsGovernment Publishing Office Employees Detailed to Congress		
Benefit	Va	lue	
Provide analysis and data to decision makers	A sound business case that has qualitative (non-financial) and quantitative (financial) data will provide a valuable tool to enable decision-makers to objectively analyze and assess information at the time of the investment proposal. An objective independent assessment of the data and information in business cases will demonstrate effective governance.		
Improve management controls	Ranking and prioritizing business cases will ensure resources are strategically used.	Leveraging available automated technologies will improve data quality and streamline processes.	
Improve systems and processes	Establishing specific requirements under which capital investment records are: effectively and efficiently managed throughout their lifecycle; preserved in accordance with the applicable statutory, and regulatory requirements; and accessible by authorized GPO staff, contractors, and public, as appropriate.	Employees validating their workhours in the time and attendance system will help improve the accuracy and timeliness of workhour administration.	
Improve program results	Performing periodic reviews of existing policies and procedures will ensure completeness and accuracy of content and that instructions align current systems, processes, and structures.	Issuing policy and procedures will provide clear lines of responsibilities, separation of duties, and promote timely, accurate, and effective workhour administration.	

Inst	Inspections: Non-monetary Impact and Benefits			
Inspection Reports	GPO Suspension and Debarment Program	GPO Priority Projects		
Benefit	Va	lue		
Improve safety, morale, health, and security	Appointing a senior accountable official responsible for suspension and debarment program management activities will provide oversight and promote program continuity and continuous review and improvement.	Establishing a process for Priority Projects will support the continued viability of GPO's business model, increase oversight and involvement by agency leadership, and ensure appropriate management of GPO funds.		
	Implementing quality control checks will enable early identification of issues, ensure adherence to GPO directives, and improve the management and accuracy of GPO's Exclusion List.			
Improve systems and processes	Adopting the FAR Subpart 9.4 could negate the effects of outdated directives and codify a practice to which some GPO staff already informally adhere.	Developing guidance and establishing a process for Priority Projects will ensure alignment with GPO's strategic plan, aid in articulation of the Director's strategic vision and assist with prioritizing the order of the Priority Projects.		
Improve program results	A case management tool or commensurate system or database will help improve the timeliness of suspension and debarment activities and decisions, and maintenance of associated records.	Identifying how priority project are developed, approved and assessed following completion can strengthen GPO's ability to provide updates to stakeholders on the status of the Priority Projects. Priority Projects assessments will also help confirm if GPO is positioned to attain its strategic goals through the Priority Projects, and to identify needed adjustments to attain those strategic goals.		
Initiate best practices	Adopting the FAR Subpart 9.4 will align GPO's suspension and debarment program with best practices used by the majority of the federal government, and decrease the likelihood that GPO could be defrauded.			

Investigations Non-monetary Impact and Benefits		
Investigative Activities	Theft of Government Property (20-0001-I)	
Benefit	Value	
Validate existing processes	Empowers GPO to pursue debarment actions. In this case, the subject's conviction enables debarring officials with sufficient evidence to prevent the subject from accessing procurement processes.	
Enhances Stakeholder Confidence	The federal conviction and restitution-remedies protect the agency's standing in the industry by holding bad actors accountable. Consequently, the positive results of this case help to mitigate fraud risks in this area and are expected to help protect the integrity of GPO contracts and the agency's reputation as a fiscally responsible broker.	
Providing analysis and data to decision makers	Lessons learned in this investigation as to how the convicted subject positioned himself/herself to further the fraud scheme provide essential insight on how to improve management controls of products related to GPO-brokered contracts. As a result, investigative results reported to agency officials are expected to facilitate their awareness of measures that can be implemented to help protect the integrity of GPO's contract management practices.	

# APPENDIX B. AUDIT AND INSPECTION REPORTS ISSUED

#### Audit and Inspection Reports Issued in Reporting Period Including Questioned Costs, Funds Put to Better Use and Other Monetary Impact

Report Name	Questioned Costs	Funds Put to Better Use	Other Monetary Impact
Audit Reports			
Evaluation of Product Billing Rates for the U.S. Government Publishing Office	\$0	\$0	\$0
Government Publishing Office Capital Investments	\$0	\$0	\$0
Government Publishing Office Employees Detailed to Congress	\$0	\$0	\$174,234 <sup>10</sup>
Inspection Reports			
Review of the GPO Suspension and Debarment Program	\$0	\$0	\$0
Review of GPO's Priority Projects	\$0	\$0	\$0
Total	\$25,828	<b>\$</b> 0	\$174,234

<sup>&</sup>lt;sup>10</sup> This represents revenue loss from annual Congressional Publishing Appropriations.

# APPENDIX C. INVESTIGATIONS STATISTICS

#### Investigations Statistics for Reporting Period<sup>11</sup>

Item	Quantity	
Investigations Open at the Beginning of the Period		8
Investigations Opened during the Reporting Period		0
Investigations Closed during the Reporting Period		4
Investigations Open at the End of the Reporting Period <sup>12</sup>		4
Complaints Open at the Beginning of the Reporting Period		2
Complaints Opened during the Reporting Period		1
Complaints Closed during the Reporting Period		3
Complaints Open at the End of the Reporting Period		0
Referrals to Other Agencies		2
Referrals to Audits and Inspections Divisions	5	
Preliminary Inquiries Open at the Beginning of the Period	5	
Preliminary Inquiries Opened during the Reporting Period	1	
Preliminary Inquiries Closed during the Reporting Period		2
Preliminary Inquiries Open at the End of the Reporting Period		4
Current Open Investigations	Number	Percentage
Procurement/Contract Fraud	5	100
Employee Misconduct	0	
Workers' Compensation Fraud	0	
IT/Computer Crimes	0	
Proactive Initiatives	0	
Other Investigations 0		0
Total 5		100

<sup>&</sup>lt;sup>11</sup> Metrics for developing data for reported statistics were obtained from OIG's Case Management Tracking System.

<sup>&</sup>lt;sup>12</sup> None of the cases falling under this category during this reporting period involve matters with active investigative action pending. Specifically, two of these cases is under formal closure process; whereas the remaining one is undergoing legal and/or administrative adjudication.

#### Investigations Productivity Statistics for Reporting Period<sup>13</sup>

Item	No. or Amount
Arrests, including Summons in Lieu of Arrest	0
Persons Referred to Federal Prosecutors	0
Persons Accepted for Federal Prosecution	0
Persons Declined for Federal Prosecution	0
Indictments/Information/Complaints	1
Convictions	1
Guilty Pleas/Deferred Prosecution Agreements	1
Criminal Fines, Fees, Recovery, and/or Restitution	\$48,257.55
Civil Settlements	0
Civil Fines, Fees, Recovery, and/or Restitution	0
Total Number of Investigative Reports Issued <sup>14</sup>	0
Referrals to GPO Management for Possible Corrective Action and/or Information Purposes	6
Total Referrals to the Audits and Inspections Divisions	5

<sup>&</sup>lt;sup>13</sup> Metrics for developing data for reported statistics were obtained from OIG's Case Management Tracking System.

<sup>&</sup>lt;sup>14</sup> During this reporting period, the OIG did not have any investigations involving a senior Government employee that was substantiated. Additionally, the OIG did not have any instances of whistleblower retaliation to report.

# APPENDIX D. AUDIT AND INSPECTION REPORTS OVER 6 MONTHS OLD

Summary of Each Audit and Inspection Report over 6 Months Old for Which No Management Decision Has Been Made<sup>15</sup>

Date Issued	Name	Report Number	Number of Recommendations	Costs
None				

<sup>15</sup> IG Act, § 5(a)(10).

Semiannual Report to Congress	Office of the Inspector General

# APPENDIX E. PRIOR AUDIT AND INSPECTION RECOMMENDATIONS

# Prior Audit and Inspection Recommendations on Which Corrective Action Has Not Been Completed in More Than 1 Year $^{16}$

Date Issued	Name of Audit	Report Number	Number of Recommendations	Monetary Impact
None				

<sup>16</sup> IG Act, § 5(a)(3).

# **APPENDIX F. STATUS OF OIG RECOMMENDATIONS**

Status of OIG Recommendations During this Reporting Period (Open and Closed)

Date Issued	Name	Report Number	Number of Recommendations Opened	Number of Recommendations Closed
12/21/2020	Cyber Security Controls Report	21-07	0	1
07/06/2021	Evaluation of GPO's Suspension and Debarment Program	21-09	5	0
08/20/2021	GPO Capital Investments	21-10	6	0
09/17/2021	GPO Employees Detailed to Congress	21-11	5	0
		Total	16	1

# APPENDIX G. REPORTING REQUIREMENTS

### Reporting Requirements under the IG Act of 1978

Reporting	Requirement	Pages	
Section 4(a)(2)	Review of Legislation and Regulations	12	
Section 5(a)(1)	Significant Problems, Abuses, and Deficiencies	4 - 11	
Section 5(a)(2)	Recommendations for Corrective Actions to Address	4 - 11	
	Significant Problems, Abuses, and Deficiencies Identified		
Section 5(a)(3)	Significant Outstanding Recommendations on which	23	
	Corrective Action has Not Been Completed		
Section 5(a)(4)	Matters Referred for Prosecutorial Authorities	9 - 11	
Section 5(a)(5);	5(a)(5); Information or Assistance Unreasonably Refused or Not		
6(b)(2)	Provided	12	
Section 5(a)(6)	List of Completed Audit, Inspection, or Evaluation Reports	19	
Section 5(a)(7)	Summary of Significant Reports	19	
Section 5(a)(8)	Statistical Tables Related to Total Value of Questioned or	19-21	
	Unsupported Costs		
Section 5(a)(9)	Statistical Tables Related to Funds Recommended To Be Put	19	
	to Better Use	15	
Section 5(a)(10)	Summary of Each Audit Report over 6 Months Old for Which	22	
	No Management Decision Has Been Made		
Section 5(a)(11)	Description and Explanation of Any Significant Revised	12	
	Management Decision		
Section 5(a)(12)	Information on Any Significant Management Decision with	12	
	which the IG Disagrees		
	Information described under section 804(b) of the Federal	N/A	
Section 5(a)(13)	Financial Management Improvement Act of 1996 – not		
	applicable to GPO		
Section 5(a)(14)	Peer Review Results	15	
Through (16)			
Section 5(a)(17)	Statistical Tables Related to Investigations	22	
Section 5(a)(18)	Description of Metrics Used for Developing the Data for the	22	
	Statistical Tables under Section 5(a)(17)		
Section 5(a)(19)	Investigations Involving Senior Government Employees	9-12	
	Where Allegations of Misconduct Were Substantiated		
Section 5(a)(20)	Description of Any Instance(s) of Whistleblower Retaliation	12	
Section 5(a)(21)	Description of Any Attempt(s) by the Agency to Interfere	12	
	with the Independence of the OIG		
Soction $F(a)(22)$	Inspections, Evaluations, Audits, and Investigations	12	
Section 5(a)(22)	Involving Senior Government Employees That Were Closed and Not Disclosed to the Public		

# APPENDIX H. ABBREVIATIONS AND ACRONYMS

#### Abbreviations and Acronyms

ARC	Appalachian Regional Commission	
CIGIE	Council of the Inspectors General on Integrity and Efficiency	
COVID-19	Corona Virus Disease 2019	
DOD	Department of Defense	
DCIS	Defense Criminal Investigative Service	
FY	Fiscal Year	
FAR	Federal Acquisition Regulation	
GAGAS	Generally Accepted Government Auditing Standards	
GPO	U.S. Government Publishing Office	
1&E	Inspections and Evaluations	
IG	Inspector General	
IG Act	Inspector General Act of 1978, as amended	
IPA	Independent Public Accounting Firm	
ІТ	Information Technology	
JCP	Joint Committee on Printing	
MIR	Management Implication Report	
OIG	Office of the Inspector General	
ROI	Return on Investment	
SDO	Suspension and Debarment Official	
SOP	Standard Operating Procedures	
U.S.C.	United States Code	

# APPENDIX I. GLOSSARY OF TERMS

#### Complaint

The initial receipt of allegations are documented immediately upon receipt, an allegation is then converted to a complaint within ten calendar days if the OIG can reasonably articulate a nexus to a violation of law, policy, practice, or a specific threat to human life, national security, or property. Complaints are then converted to full investigations within 30 days, provided there is reason to believe that a crime, tort, or violation of policy within the OIG's jurisdiction has been developed; if not, the matter shall be closed.

#### Consideration

A suggested corrective action to address potential deficiencies or problems. Considerations do not rise to the level of formal recommendations and are not tracked by the OIG.

#### **Criminal Complaint**

A formal charging document that sets out the facts and cause of action (establishing probable cause) that the Government alleges are sufficient to support a claim against the charged party (the defendant).

#### Finding

Statement of problem identified during an audit or inspection typically having criteria, condition, cause, and effect.

#### Follow-Up

The process that ensures prompt and responsive action once resolution is reached on an OIG recommendation.

#### Funds Put To Better Use

An OIG recommendation that funds could be used more efficiently if management took actions to implement and complete the audit or inspection recommendation.

#### Indictment

The written formal charge of a crime by the grand jury, returned when 12 or more grand jurors vote in favor of it.

#### Information

The written formal charge of crime by a U.S. Attorney, filed against an accused who, if charged with a serious crime, must have knowingly waived the requirements that the evidence first be presented to a grand jury

#### Investigation

OIG conducts criminal, civil, and administrative investigations relating to violations of federal laws, rules, or regulations as they pertain to GPO programs, contracts, and operations, and also investigates allegations of criminal activity and serious misconduct on the part of GPO employees. Fraud investigations typically result from allegations or suspicions of wrongdoing involving GPO programs, operations, or personnel. Investigations may also be the result of broad initiatives arising from previous OIG activities or as part of broad interagency initiative.

#### **Management Implication Report**

A report to management issued during or at the completion of an investigation identifying systemic problems or advising management of significant issues that require immediate attention.

#### **Management Letter**

A management letter describes the deficiencies in internal controls identified during the audit that do not rise to the level of seriousness to be stated in the final auditor's report.

#### **Material Weakness**

A significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected.

#### **Questioned Cost**

A cost the OIG questions because of an alleged violation of a law, regulation, contract, cooperative agreement, or other document governing the expenditure of funds; such cost is not supported by adequate documentation; or the expenditure of funds for the intended purposes was determined by the OIG to be unnecessary or unreasonable.

#### Recommendation

Action needed to correct or eliminate recurrence of the cause of an identified finding.

#### **Resolved Audit/Inspection**

A report containing recommendations that have all been resolved without exception but not yet implemented.

#### **Return on Investment**

Return on Investment (ROI) is a commonly used profitability ratio that measures the amount of return, or profit, an investment generates relative to cost. The ROI for an OIG is the most quantifiable metric of performance and considers the cost of doing business and the revenues they collect.

#### Unsupported Cost

A questioned cost not supported by adequate documentation.





# **REPORT FRAUD, WASTE, OR 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.

> U.S. Government Publishing Office Office of the Inspector General P.O. Box 1790 Washington, DC 20013-1790

Email:gpoighotline@gpo.gov

Fax: 202.512.1352

Main Number: 202.512.0039

Hotline: 1.800.743.7574



www.gpo.gov/oig/