



**U.S. ELECTION ASSISTANCE COMMISSION  
OFFICE OF INSPECTOR GENERAL**



**SEMIANNUAL REPORT TO CONGRESS**

**APRIL 1, 2023 - SEPTEMBER 30, 2023**

## Message from the Inspector General



**Brianna Schletz**  
Inspector General

I am pleased to present this *Semiannual Report to Congress* covering the oversight activities of the Office of Inspector General (OIG) for the U.S. Election Commission (EAC) from March 31, 2023, to September 30, 2023. This is in accordance with the Inspector General Act of 1978, as amended (IG Act).

During this semiannual period, EAC expanded its team to over 60 staff to meet EAC’s mission—to help election officials improve the administration of elections and help Americans participate in the voting process. OIG continues to work toward its mission to safeguard the federal investment in our electoral system by conducting objective and meaningful oversight of EAC and its programs.

An important factor to ensure our work is effective is having the appropriate independence. The Inspector General Empowerment Act of 2016 sought to strengthen the independence of IGs. To this aim, we have launched a new hotline portal, where previously OIG received complaints through an OIG email form on the agency’s email system, complaints can now be submitted directly through a portal that only OIG employees can access. We have a separate and distinct OIG logo, and with the support of the Council for Inspectors General on Integrity and Efficiency, we are launching an independent OIG website so we can post our own content and reports.

Aligned with our strategic goal of fostering stakeholder coordination and encouraging transparency, we have made great strides in ensuring that EAC staff and stakeholders know OIG’s role and mission. In August, OIG presented our first fraud awareness briefing at an EAC staff meeting. In September, OIG presented our role and mission at entrance conferences for six state audits. In July, I had the privilege of representing OIG at the National Association of State Election Directors summer conference to answer questions about OIG’s audit process and similarly provided testimony at the House Administration Oversight Hearing in July. See page 13 for more information on how OIG is achieving its strategic goals.

During the second half of fiscal year 2023, we processed 136 unique [OIG Hotline](#) complaints. We issued four audit reports, a risk assessment report, a review, and a management advisory. We also have fourteen ongoing projects: one mandatory audit, an evaluation, ten audits of Help America Vote Act (HAVA) grants (American Samoa, Georgia, Guam, Iowa, Michigan, Minnesota, New Jersey, North Carolina, Rhode Island, and Tennessee), and two discretionary audits. I look forward to continuing to promote economy, efficiency, and effectiveness in EAC programs and operations.

## Table of Contents

---

Election Assistance Commission Profile	1
Office of Inspector General Profile/Mission	1
Audits, Inspections, and Evaluations	2
Investigations and Whistleblower Retaliation	7
Questioned Costs, Unsupported Costs, and Funds Put to Better Use	9
Summary of Recommendations Closed During the Reporting Period	9
Summary of Outstanding Recommendations	10
Peer Review Activity	12
Annual Progress on Strategic Plan	13
Semiannual Reporting Requirements	17

## Election Assistance Commission Profile

Congress established the U.S. Election Assistance Commission (EAC or Commission) through the passage of the Help America Vote Act (HAVA) of 2002 (Pub. L. 107-252). EAC is an independent, bipartisan commission that serves as a national clearinghouse and resource for the compilation of information and review of procedures for the administration of federal elections. The President appoints and the Senate approves four commissioners authorized by HAVA.

EAC's principal duties include maintaining a national clearinghouse of information on election administration; testing and certifying, decertifying, and recertifying voting systems; adopting voluntary voting system guidelines; and administering grants authorized by HAVA. From inception to 2011, EAC distributed over \$3 billion in grants to the 50 states, in addition to the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, and American Samoa (hereinafter referred to as "states and territories"). In 2020, the Northern Mariana Islands also became an EAC grant recipient.

Most recently, in both the 2022 and 2023 appropriations, EAC received \$75 million in HAVA Election Security Grant funds to be awarded to states and territories. The purpose of the awards is to "improve the administration of elections for federal office, including to enhance election technology and make election security improvements." EAC also received \$1 million for the Help America Vote College Program, to remain available until expended. Learn more at [www.eac.gov](http://www.eac.gov).

## Office of Inspector General Profile/Mission

Created in 2005, the Office of Inspector General is an independent division of EAC. HAVA required the appointment of an Inspector General (IG) for EAC and amended the Inspector General Act (IG Act) of 1978 to identify EAC as a Designated Federal Entity. During this 6-month period, OIG has reached five full-time employees—the Inspector General, Assistant Inspector General for Audit, a senior auditor, and two program analysts. The OIG plans to onboard an attorney that will handle investigations and operations in November 2023. OIG continues to leverage its staff resources, contracts for audits with independent public accounting (IPA) firms, and services from other federal agencies to perform the duties required under the IG Act.

As a small OIG, the office relies on EAC for functions related to information technology, budget, and human resources. To increase the office's budget independence, EAC OIG continues to work with the Office of Management and Budget and EAC to ensure that OIG's budget is specified as an amount "no less than" within the President's Budget and Appropriations language. This aligns with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE) [legislative priority](#) on Enhancing Independence and Efficiency by Providing Separate and Flexible OIG Funding.



*New EAC OIG Logo*

The primary mission of OIG is to conduct independent audits, evaluations, inspections, and investigations to promote economy and efficiency and to prevent and detect fraud, waste, abuse, and mismanagement in the programs and operations of EAC. The three primary activities are: 1) audits of grant recipients, 2) audits of programs and operations, and 3) investigations related to staff, operations, or grant recipients.

## Audits, Inspections, and Evaluations

During the 6 months that ended September 30, 2023, OIG issued seven products: one mandatory audit, one mandatory review, a risk assessment, three HAVA grant audits, and one management advisory. Final reports are publicly accessible via the [EAC OIG website](#) and on [Oversight.gov](#).

### Audit of the U.S. Election Assistance Commission's Compliance with the Federal Information Security Modernization Act (FISMA) for Fiscal Year 2023

OIG engaged an independent public accounting firm to conduct the fiscal year 2023 FISMA audit. The objective was to determine whether EAC implemented selected security controls for certain information systems in support of FISMA. The [final report](#) was issued in August 2023. OIG found that EAC generally complied with FISMA requirements by implementing selected security controls for tested systems. EAC received an overall *Level 4 – Managed and Measurable* maturity level; therefore, the EAC information security program is effective. OIG made six recommendations to address vulnerabilities. Specifically, EAC OCIO should (1) consistently resolve known vulnerabilities; (2) improve its configuration procedures; (3) maintain hardware inventory records according to federal requirements; (4) develop plan of action and milestone reports according to federal requirements; (5) update the system security and privacy requirements in accordance with NIST; and (6) implement its governance, risk and compliance solution to manage risk. There were also two recommendations from prior year FISMA reports that remain open.

### Review of EAC's Compliance with the Payment Integrity Information Act for Fiscal Year 2022

OIG conducted this required review under the Payment Integrity Information Act (PIIA) to determine if EAC's improper payments reporting in the annual financial statement complied with PIIA's fiscal year 2022 reporting requirement. The [final report](#) was issued in May 2023. We determined that EAC was compliant with PIIA reporting requirements for FY 2022 and prior recommendations have been resolved.

### Risk Assessment of EAC's Grant Closeout Procedures

OIG conducted this risk assessment of the EAC's grant closeout procedures to (1) gain an understanding of EAC's grant closeout process (both administrative and final), (2) determine the volume of grants that have not been closed out, (3) identify challenges leading to delays in grant closeouts, if any, and (4) determine any areas of risk that warrant an audit or further consideration. The [final report](#) was issued in

September 2023. We found that EAC has ten open grants and there are opportunities to strengthen internal controls and improve consistency in the closeout process; however, we determined that no further audit was necessary at this time.

### HAVA Grant Audits

During this semiannual period, OIG completed three audits of the administration of payments received under the Help America Vote Act. The three audit reports contained 13 recommendations and just over \$50,000 in questioned or unsupported costs. Summaries of each completed audit are below.

**3** HAVA Audit Reports Issued  
**13** Audit Recommendations  
**70.0** \$ Audited, in Millions  
**51,456** \$ Questioned

### Missouri

OIG engaged the independent public accounting firm of McBride, Lock and Associates, LLC, to conduct an audit of funds received by the State of Missouri under HAVA, including state matching funds and interest earned, totaling \$27.4 million. The [final report](#) was issued in August 2023.

The audit found that the Missouri Secretary of State's Office generally used funds in accordance with applicable requirements, accounted for and controlled property purchased, used funds in a manner consistent with the informational plans that they had submitted, and followed proper closeout procedures for CARES Act funds. However, there were four exceptions and OIG made seven recommendations to address the findings.

#### Audit of HAVA Grants Awarded to the State of Missouri



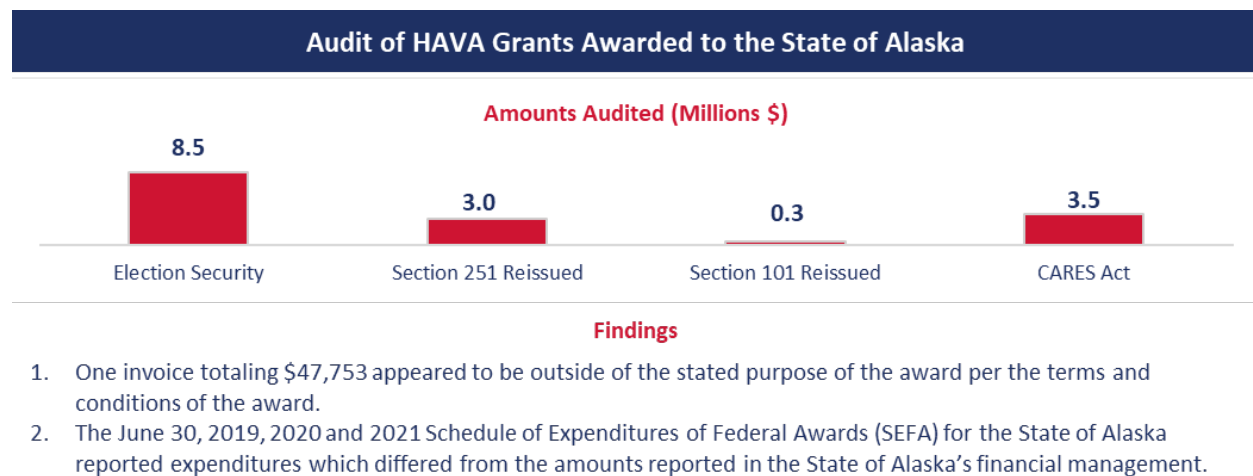
#### Findings

1. The Office's monitoring of subrecipients did not ensure that purchases were only for allowable costs.
2. The Office's monitoring of subrecipients did not ensure that subrecipient property records were maintained.
3. The Office did not provide sufficient documentation to support the interest earned on the HAVA funds placed in the election fund.
4. The June 30, 2021 Schedule of Expenditures of Federal Awards (SEFA) for the State of Missouri reported expenditures which differed from the amounts reported in the State of Missouri's financial management system.

## Alaska

OIG engaged the independent public accounting firm of McBride, Lock and Associates, LLC, to conduct an audit of the funds received by the State of Alaska under HAVA, including state matching funds and interest earned, totaling \$15.2 million. The [final report](#) was issued in August 2023.

The audit found that the Alaska Office of the Lieutenant Governor generally used funds in accordance with applicable requirements, accounted for and controlled property purchased, used the funds in a manner consistent with the informational plans that they had submitted, and followed proper closeout procedures for CARES Act funds. However, there were two exceptions and OIG made three recommendations to address the findings.



## Wisconsin

OIG engaged the independent public accounting firm of McBride, Lock and Associates, LLC, to conduct an audit of the fund received by the State of Wisconsin under HAVA, including state matching funds and interest earned, totaling \$27.4 million. The [final report](#) was issued in September 2023.

The audit found that the State of Wisconsin Elections Commission generally used funds in accordance with applicable requirements, accounted for and controlled property purchased, used the funds in a manner consistent with the informational plans that they had submitted, and followed proper closeout procedures for CARES Act funds. However, there were two exceptions because subrecipients did not provide support until after fieldwork was completed and OIG made three recommendations.

## Audit of HAVA Grants Awarded to the State of Wisconsin



### Findings

- Two subrecipients did not provide support for expenditures until after audit fieldwork was complete.
- The monitoring of subrecipients' property records was not sufficient, resulting in three subrecipients that did not provide auditors with requested documentation until after audit fieldwork was complete.

### **Management Advisory: FACA Board Spending**

OIG issued a [management advisory](#) in July 2023 to alert EAC of recent FACA board costs that were incurred without appropriate policies and procedures to ensure that federal regulations were followed and costs were minimized. OIG found that the EAC had exceeded established rates for food and lodging while hosting EAC Standards Board meetings in Phoenix and Washington, DC. OIG urged agency officials to develop internal policies to ensure federal travel expenses are allowable and cost-effective.

### **Ongoing and Initiated Work During the Semiannual Period**

OIG has fourteen ongoing projects, four of which were ongoing on April 1, 2023:

Title	Objective(s)	Conducted By (IPA /OIG)
<i>Audit of the HAVA Grants Awarded to North Carolina</i>	To determine whether North Carolina (1) used funds for authorized purposes in accordance with applicable requirements, (2) properly accounted for and controlled property purchased with EAC funds, and (3) used funds for intended purposes. We will also determine whether North Carolina complied with requirements for state matching funds.	OIG
<i>Audit of the HAVA Grants Awarded to American Samoa</i>	To determine whether American Samoa (1) used funds for authorized purposes in accordance with Sections 101 and 251 of HAVA and other applicable requirements; (2) properly accounted for and controlled property purchased with HAVA	IPA



Title	Objective(s)	Conducted By (IPA /OIG)
	payments; and (3) used funds in a manner consistent with the informational plans provided to EAC.	
<i>Audit of the HAVA Grants Awarded to Guam</i>	To determine whether Guam (1) used funds for authorized purposes in accordance with Sections 101 and 251 of HAVA and other applicable requirements; (2) properly accounted for and controlled property purchased with HAVA payments; and (3) used funds in a manner consistent with the informational plans provided to EAC.	IPA
<i>Audit of EAC's Contracting and Procurement Activities</i>	To determine whether EAC (1) complied with selected Federal Acquisition Regulations and (2) complied with selected provisions of the Digital Accountability and Transparency Act of 2014.	OIG

Ten projects commenced during the semiannual period:

**Audit of the HAVA Grants Awarded to Georgia.** In May 2023, OIG announced an audit of Georgia's administration of funds received under the Help America Vote Act. The objectives of the audit are to determine whether Georgia used funds in accordance with HAVA and applicable requirements and whether the state implemented corrective actions to address deficiencies noted in a prior audit.

**Audit of Interest Allocation of Grants Received Under HAVA.** In May 2023, OIG announced an audit of selected states' compliance with applicable requirements for interest earned on Help America Vote Act funds. The objectives are to (1) determine whether selected states complied with applicable requirements for interest earned on HAVA funds, and (2) identify challenges and best practices that impact states' ability to comply with applicable requirements for interest earned on HAVA funds. OIG has contracted with the independent public accounting firm of McBride, Lock and Associates, LLC.

**Fiscal Year 2023 Financial Statement Audit.** In May 2023, OIG announced an audit of EAC's financial statements for fiscal year 2023. The objectives are to (1) express an opinion on whether the EAC's financial statements as of and for the fiscal year ended September 30, 2023 are fairly presented, in all material respects, in accordance with U.S. generally accepted accounting principles; (2) report any significant deficiencies and material weaknesses in internal control over financial reporting for fiscal year 2023 that come to our attention as a result of the audit; and (3) report on the results of our tests of the EAC's compliance with selected provisions of applicable laws, regulations, contracts, and grant

agreements for fiscal year 2023. OIG has contracted with the independent public accounting firm of Allmond and Company, LLC.

**Audits of the HAVA Grants Awarded to Iowa, Michigan, Minnesota, New Jersey, Rhode Island, and Tennessee.** In August 2023, OIG announced audits of Iowa, Michigan, Minnesota, New Jersey, Rhode Island, and Tennessee’s administration of funds received under the Help America Vote Act. The objectives of the audits are to determine whether the states used funds in accordance with HAVA and applicable requirements. OIG has contracted with the independent public accounting firm of Brown & Company CPAs and Management Consultants, PLLC.

**Impact Evaluation of the HAVA Grants Awarded to the Commonwealth of Virginia.** In September 2023, OIG announced an impact evaluation of how the Commonwealth of Virginia assessed needs and distributed Section 251 and election security grant funds. The evaluation will also select a sample of counties and determine the impact of HAVA funds received.

## Investigations and Whistleblower Retaliation

During this semiannual period, EAC OIG continued to use an interagency agreement for investigative services with the Department of Interior (DOI) OIG. In the event EAC OIG receives allegations that require further review, or it encounters fraud indicators during an audit, EAC OIG works with DOI OIG to determine whether to open an investigation.

In July, EAC OIG launched a new hotline portal that receives complaint submissions through a direct web form. The portal provides complainants with information on where to report other issues that are not within EAC OIG’s jurisdiction. We can also still receive complaints via direct email.

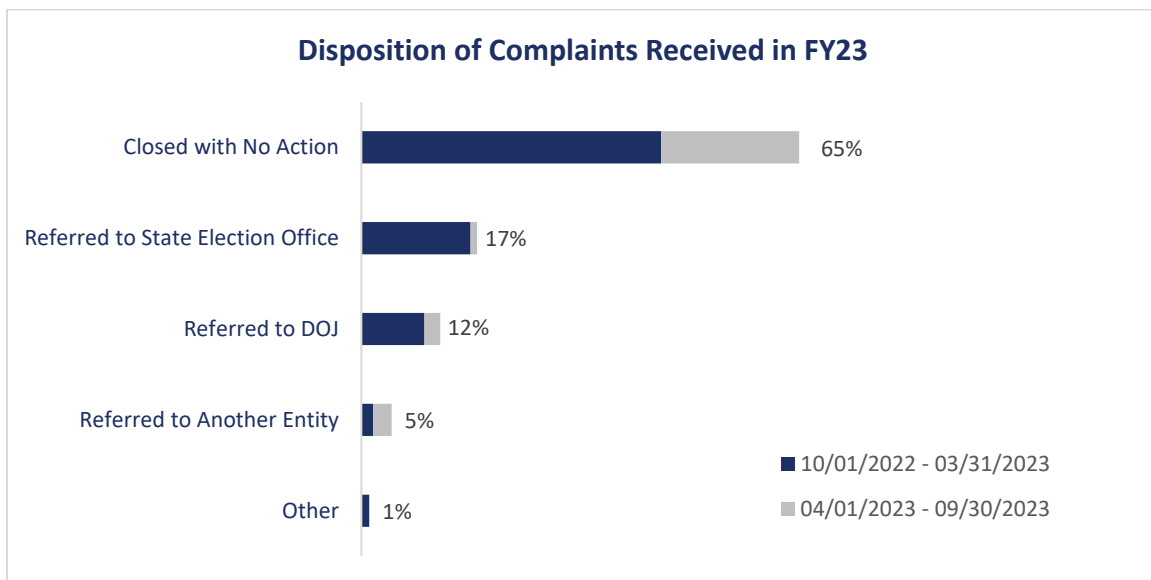
---

*DOJ’s Election Crimes Branch supervises the nationwide response to election crimes, such as voter fraud.*

---

The OIG Hotline serves as a vehicle through which EAC employees, as well as members of the public, may report suspected fraud, waste, abuse, and mismanagement. EAC OIG works with the Department of Justice (DOJ) Public Integrity Section and its FBI contacts to refer any potential criminal acts related to federal elections and voter fraud that are received. The DOJ Public Integrity Section oversees the investigation and prosecution of federal crimes affecting government integrity, including election crimes. The [Election Crimes Branch](#) within the section supervises the nationwide response to election crimes, such as voter fraud and campaign-finance offenses. When we receive complaints that are not within EAC OIG’s jurisdiction but are related to election crimes, such as voter fraud, we forward the information to DOJ without assessing whether it is a viable complaint.

We received 136 complaints during the semiannual period, with 105 being closed with no action. Generally, these complaints did not deal with EAC programs or grants and, therefore, were not within EAC OIG's purview, or there was not enough information to refer the complainant to an appropriate entity. The figure below demonstrates the disposition of complaints received by EAC OIG for the last year. We believe that some of the decrease in the second half of the year can be attributed to improved messaging on EAC OIG's new hotline portal about where to make complaints that are not within our jurisdiction.



The authority and responsibility to administer elections is specifically reserved for states and territories. When EAC OIG receives complaints related to voter registration or administration of elections, we refer the complainant to the appropriate state election office. During this reporting period we made five such referrals.

In addition, the Office of Special Counsel has primary jurisdiction over investigating allegations of prohibited personnel practices including whistleblower retaliation. When OIG receives complaints that allege a prohibited personnel practice or whistleblower retaliation, we refer them to the Office of Special Counsel. During this reporting period we made four such referrals.

OIG did not complete any investigations during this semiannual reporting period. OIG did not perform or report on any investigations involving senior government employees.

## Questioned Costs, Unsupported Costs, and Funds Put to Better Use

During this semiannual period, OIG issued two reports with recommendations for questioned or unsupported costs, and funds put to better use totaling \$51,456. EAC is working with the states involved to recover any unallowable costs.

Description	Audit Reports	Total in Audit Report
Unallowable Cost	<a href="#">Audit of the HAVA Grants Awarded to Alaska</a>	\$47,753
Unsupported and Unallowable Costs	<a href="#">Audit of the HAVA Grants Awarded to Missouri</a>	\$3,703

## Summary of Recommendations Closed During the Reporting Period

During the semiannual period, OIG closed 21 recommendations and sustained \$52,896 in questioned costs.

Report	Recommendations Closed this Period	Sustained Questioned Costs
<a href="#">Audit of the HAVA Grants Awarded to the State of Alaska</a>	1, 2, 3	\$47,753
<a href="#">Audit of the HAVA Grants Awarded to the State of Wisconsin</a>	1	
<a href="#">Audit of the HAVA Grants Awarded to the State of California</a>	1, 2, 3, 4, 5, 6, 7, 8	\$5,143
<a href="#">Audit of the HAVA Grants Awarded to the State of Delaware</a>	8	
<a href="#">Audit of EAC's Compliance with FISMA, FY 2021</a>	1, 2	
<a href="#">Audit of EAC's Compliance with FISMA, FY 2022</a>	1, 3, 4, 5	
<a href="#">Audit of the EAC's Testing and Certification Program</a>	3, 4	

## Summary of Outstanding Recommendations

As of September 30, 2023, OIG has four reports containing ten open recommendations that are more than 6 months old and for which EAC management had not completed final corrective actions.

<i>U.S. Election Assistance Commission's Policy Review, August 2017, I-PA-EAC-03-17</i>	
<b>Recommendation</b>	<b>Status as of September 30, 2023</b>
Enhance the records management system to document EAC's decisions, operations, policies, procedures, and practices.	EAC continues to report progress on this recommendation. Specifically, EAC reports that they onboarded a records management specialist in September 2023 who is updating the records management system to ensure compliance with federal guidelines.
<i>Audit of the HAVA Grants Awarded to the State of Delaware, September 2022, G22DE0010-22-06</i>	
<b>Recommendation</b>	<b>Status as of September 30, 2023</b>
Require the Office to provide the inventory listing maintained by the IT Department and each County.	The Office has submitted updated inventories from its IT department but lacks adequate safeguards outlined in 2 CFR 200.313 that properly identifies each item. EAC expects the date of completion to be November 1, 2023.
Require the Office to provide transaction detail of interest income earned for the Election Security and CARES Act grants.	The Office has provided calculations determining lost interest earned under the Election Security grant but has not yet updated past FFR's to reflect new amounts. EAC expects completion around November 1, 2023.
Require the Office to complete and file FFRs for the Section 251 funds or if the Office is unable to complete the Section 251 FFR, obtain financial services to support the completion of the filings.	The Office has not yet submitted FFR's for the 251 grant. EAC reports that resolution is ongoing and expected completion date is December 1, 2023.

<i>Audit of the EAC's Compliance with FISMA, FY 2022, November 2022, O22HQ0006-23-02</i>	
<b>Recommendation</b>	<b>Status as of September 30, 2023</b>
EAC OCIO develop and implement a flaw remediation plan for vulnerabilities that cannot be remediated within the policy recommended timeframes.	OCIO maintains detailed vulnerability remediation plans within its POA&M document. EAC further reports they have hired an additional cyber analyst who is working to improve the speed with which these vulnerabilities are remediated. EAC expects remediation of vulnerabilities within the first quarter of FY 2024.
<i>Audit of the EAC's Testing and Certification Program, March 2023, P22HQ0018-23-05</i>	
<b>Recommendation</b>	<b>Status as of September 30, 2023</b>
EAC establish regular coordination with NIST and review the accreditation procedures for voting system test labs to reduce potential areas of duplication or identify efficiencies.	Target date for completion of this corrective action is June 2024.
EAC develop policies to ensure periodic meetings with voting system test laboratories and voting system manufacturers occur and the non-sensitive meeting minutes are published.	The policy is currently being drafted and the target date is November 2023.
EAC update the records disposition schedule for the testing and certification program.	A new employee with expertise in creating records disposition schedules was recently hired by the agency. The division will request assistance with creating a schedule for the division.
EAC utilize federal guidance to conduct a staffing assessment for the testing and certification program. As part of this, consider what technical competencies are required for the team and if any are already covered with the NIST review.	Target date for completion of this corrective action is December 2023.

EAC identify, measure, and assess risks related to its testing and certification program, ideally as part of a broader enterprise risk management program.	Target date for completion of this corrective action is December 2023.
--	--

**NOTE:** Recommendations associated with the *Audit of the HAVA Grants Awarded to the State of Delaware* may have cost savings when the state determines interest income calculation and submits required reports.

At the end of the reporting period, EAC provided information for the closure of four recommendations associated with the report titled *Audit of the Help America Vote Act Grants Awarded to the Commonwealth of the Northern Mariana Islands*, dated February 2023. OIG is working with EAC to determine if final corrective action is complete.

## Peer Review Activity

Section 989C of the Dodd-Frank Act contains additional semiannual reporting requirements pertaining to peer review reports. Federal Inspectors General are required to engage in peer review processes related to both their audit and investigative operations. In keeping with Section 989C, EAC OIG is reporting the following information related to its audit peer review activities. These activities cover our roles as both the reviewed and the reviewing OIG.

In 3-year cycles, CIGIE coordinates peer reviews of each OIG audit organization. CIGIE's peer review program tests an OIG's system of quality control in accordance with the *CIGIE Guide for Conducting Peer Reviews of the Audit Organizations of Federal Offices of Inspector General*.

### EAC OIG Peer Review

EAC OIG's modified peer review for the 3-year period ending March 31, 2021, was performed by the U.S. Federal Labor Relations Authority (FLRA) OIG, and the final peer review report was issued to EAC's Deputy IG on July 19, 2021. The [final report](#) is posted on our website and concluded that the established policies and procedures for the audit function as of March 31, 2021, were current and consistent with applicable professional standards, as stated.

The review report did not cite any deficiencies. However, EAC OIG received a Letter of Comment that included two findings with recommendations to improve established policies and procedures. EAC OIG has fully addressed the recommendations. EAC OIG's next peer review is scheduled for the 3-year period ending March 31, 2024.

## Peer Review of the National Endowment for the Humanities OIG Conducted by EAC OIG

On September 16, 2022, EAC OIG issued a [System Review Report](#) on the audit organization of the National Endowment for the Humanities (NEH) OIG for the 3-year period ending March 31, 2022. We found that the system of control for the audit organization had been suitably designed and complied with requirements to provide NEH OIG with a reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. NEH OIG received a peer review rating of “Pass” and reports that they have closed the 3 recommendations made.

## Annual Progress on Strategic Plan

In March 2022, we updated our [strategic plan](#) and established measurable goals to help OIG reach its vision of operating as a high-performing organization and to help EAC be as efficient and effective as it can be. We identified performance metrics to assess progress toward our intended outcomes of improving OIG processes, performance, and collaboration with stakeholders.

### Goal 1: Assess and Improve OIG’s Processes

Objective	Measurement	FY 2022 Actual	FY 2023 Target	FY 2023 Actual	FY 2024 Target
1.1	<a href="#">Number of Policies Updated/Established</a>	40	27	28	2
1.2	Closed Peer Review Recommendations	Complete	N/A	N/A	TBD
	Establish Annual Monitoring, Implement Improvements	Complete	Complete	Complete	Complete
	Pass Peer Review	N/A	N/A	N/A	Pass
1.3	Establish Interagency Agreement for Investigations	Yes	Yes	Yes	Yes
	Report Investigative Statistics in Semiannual Report	Yes	Yes	Yes	Yes

*Objective 1.1: At the start of FY 2022 EAC OIG had 67 policies in place. In FY 2022, 38 of those were updated and consolidated into separate Audit and Investigations Handbooks. During FY 2023, EAC OIG updated and consolidated the remaining 27 policies, which primarily addressed administrative matters.*



EAC OIG also established a Manual for Conducting Evaluations, Reviews, and Inspections. As of September 30, 2023, EAC OIG had 7 manuals/policies in place.

### Goal 2: Increase Performance and Value-Add Oversight

Objective	Measurement	FY 2022 Actual	FY 2023 Target	FY 2023 Actual	FY 2024 Target
2.1	Update Annual Planning Process	Yes	N/A	N/A	Reassess
	<a href="#"># of creative solutions and impact on resources or results</a>	4	2	5	2
	Enterprise Risk Management	No	Yes	Yes	Yes
2.2	Meet mandatory audit requirements	Yes	Yes	Yes	Yes
	Discretionary oversight work in progress	9	8	13	8
	Evaluate cost/benefit for current audit workload	No	Yes	In Process	Yes
	Pilot and assess internal audit oversight of grants	Piloted but not yet complete	Complete	Complete	Assess
	Percentage of audit recommendations EAC agreed to	82	90	>90	90
	<a href="#">Biennial follow up work on previous audit recommendations</a>	Planned	Started	Complete	N/A
2.3	<a href="#">Establish program for supporting EAC in outreach efforts to states</a>	No	Draft Program	Piloted 8/1	1 Presentation
	<a href="#">Number of outreach efforts</a>	1	2	4	2
	<a href="#">Impact of outreach efforts</a>	-	-	-	-

**Objective 2.1:** A solution is creative if it is an original and previously unknown way to solve a problem. During FY 2023, EAC OIG implemented six creative solutions that had an impact on resources or results:

1. In 2023, EAC OIG issued three management advisories to alert EAC management to areas of risk. The advisory allowed EAC to assess and make changes to processes immediately rather than waiting for the OIG to conduct a full audit of the subject matter. This was an effective use of OIG resources and has an immediate positive effect on EAC operations.
2. Since 2005 OIG has issued 48 audit recommendations across 31 states and territories related to interest income. The recommendations generally relate to the calculation of interest and depositing interest into the election fund. EAC OIG leveraged this historical audit finding related to interest earned and in May 2023 commenced an audit of interest earned on EAC grants across 34 states. This approach allows us to look broadly across states but narrowing the focus to a historically problematic area to identify challenges and best practices.
3. In July 2023, EAC OIG launched a new hotline portal. The platform’s automated features reduce spam and help OIG manage critical information in a secure manner. The interface’s updated messaging has reduced the number of complaints we receive that are not within EAC OIG’s jurisdiction. These improvements result in improved hotline efficiency.
4. At the end of the last reporting period, OIG issued a suspension and debarment referral and memo to EAC for management to consider establishing a Suspension and Debarment Program. In April 2023, EAC OIG facilitated a meeting between EAC management and federal suspension and debarment experts. This approach connected EAC with appropriate resources and training to handle future suspension and debarment referrals.
5. OIG developed a “one pager” to help effectively deliver information about our oversight activities and facilitate a productive conversation on the issues of importance to our organization.

**Highlights from Recently Issued Work**

**EAC's FY23 FDMA Audit**  
In August 2023, OIG issued a report on EAC's compliance with the Federal Information System Modernization Act of 2014 (FISMA) for FY23. Overall, EAC's information security program was deemed effective. However, OIG's recommendations—primarily related to risk assessment—were made to improve the program.

**Risk Assessment of EAC's Grant Closeout Procedures**  
In September 2023, OIG issued a report on a risk assessment conducted of EAC's grant closeout procedures. OIG found that (1) the process deviates from federal requirements in some areas, (2) ten EAC grants remain open despite policies requiring closure, (3) EAC identified grants and system challenges leading to delays in closeout, and (4) opportunities exist to strengthen internal controls and improve consistency in the closeout process.

**Key Ongoing Work and Initiatives**

**HAVA Grant Audit**  
OIG is conducting audits of HAVA (CARET Act) funds:

Starting	Timeline
OIG	North Carolina exit conference held in August
Georgia	Site visit conducted in September
Independent Accounting Firm	American Samoa draft report issued in October
Chapin	Draft report issued in September
Texas, Michigan, Minnesota, New Jersey, Rhode Island, and Tennessee	exit conference held in September

**HAVA Grant Interest Audit**  
A common finding in past audit work in that states and territories are not appropriately crediting interest earned on HAVA grants to their election funds. This audit looks into the interest allocation of states and territories to identify challenge areas and best practices. Accounting firm staff began work in May and expect to finish by March 2024.

**EAC's FY23 Financial Statement Audit**  
OIG has engaged an independent accounting firm to audit EAC's financial statements for the fiscal year ended September 30, 2023. Testing is currently in process; the final report is expected in November.

**Audit of EAC's Contracting Activities**  
The objective of this audit is to determine whether EAC has complied with Federal Acquisition Regulation when contracting for goods and services using internal resources. We are conducting this audit following risk factors that were identified during the audit of the FY22 financial statements. OIG staff began work in May and expect to finish this fall.

**Impact Evaluation of the HAVA Grants Awarded to Virginia**  
OIG is conducting an evaluation of HAVA grant funds awarded to Virginia. The evaluation is evaluating how the Commonwealth assessed needs and distributed HAVA funds. It is also selecting a sample of counties and determining the impact of the HAVA funds received. Work began in September 2023, and OIG anticipates completing the evaluation by May 2024.

**OIG Hotline**  
We continue to monitor hotline complaints and have moved to a new online portal.

**Top Management Challenges & Oversight Planning**  
OIG has drafted the FY24 Top Management Challenges report and began planning engagements included in the FY24 oversight plan.

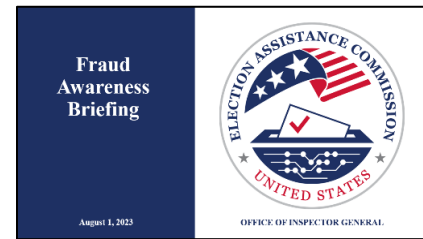
EAC OIG's "One Pager"

As a result of OIG establishing an Enterprise Risk Management program, OIG determined that areas where we lack independence are a risk to the OIG mission. To mitigate this risk, OIG is taking steps to increase independence in areas that could be vulnerable to our ability to perform independent oversight of EAC operations. During this reporting period, OIG began using a separate system for performance management via a CIGIE-negotiated MOU for shared services for access to USA Performance. USA

Performance is the U.S. Office of Personnel Management’s software solution to assist Federal agencies in implementing their performance management programs.

*Objective 2.2:* EAC OIG’s FY 2023 audit of EAC’s Testing and Certification Program assessed the progress EAC had made in responding to recommendations made by the Government Accountability Office in 2008. Our ongoing audits of EAC’s procurement practices and Georgia’s HAVA grants awarded also include steps to follow up on prior years’ recommendations.

*Objective 2.3:* In August 2023, EAC OIG made a fraud awareness presentation to EAC staff. This presentation was designed to help attendees recognize red flags and know how to submit a complaint to OIG if necessary. We also provided staff with definitions and examples of fraud, waste, and abuse. Following the successful pilot, EAC OIG will tailor the presentation for EAC’s grantees and begin delivery in FY 2024.



*EAC OIG’s Fraud Awareness Presentation*

In February 2023, EAC OIG attended the National Association of State Election Directors Winter Conference, and the Inspector General was on a panel for the 2023 Spring Conference. In April 2023, EAC OIG presented at a regular meeting for the National Association of Secretaries of State on the Office’s mission and strategy. Every attendee was provided with the Office’s contact information and encouraged to reach out. In July 2023, the Inspector General provided testimony for the House Administration Committee Oversight Hearing.

### **Goal 3: Foster Stakeholder Collaboration and Encourage Transparency**

Objective	Measurement	FY 2022 Actual	FY 2023 Target	FY 2023 Actual	FY 2024 Target
3.1	<a href="#">Number of stakeholder communications</a>	>20	>20	>20	>20
	<a href="#">Impact of outreach efforts</a>	-	-	-	-
3.2	Establish Communications and Outreach Strategy	Drafted	Final Version	Final Version	Update
	<a href="#">Number of partnerships with oversight agencies</a>	5	3	5	4
	<a href="#">Results/Impact of Partnerships</a>	-	-	-	-
3.3	Percentage of	100	100	100	100

Objective	Measurement	FY 2022 Actual	FY 2023 Target	FY 2023 Actual	FY 2024 Target
	reports posted on EAC OIG website and oversight.gov within 3 days of issuance				

*Objective 3.1:* Stakeholders that EAC OIG meets with on a regular basis include the EAC Commissioners, the EAC Executive Director and Deputy General Counsel, and the U.S. Senate Committee on Rules and Administration. Periodic or as-requested meetings have also been held with The National Association of State Election Directors, and the Committee on House Administration. In FY 2023, we also established communication with our Office of Management and Budget examiner.

An impact of these continued communications is that the Inspector General was invited to [testify about the work of the OIG](#) and to present at the NASED conference signifying awareness and support of the OIG's work. Internally, the impact of OIG communication efforts is an uptick in EAC employee's engagement with the office. Finally, EAC OIG work has been highlighted in other oversight products. Specifically, the U.S. Government Accountability Office referenced EAC OIG's [Audit of the Help America Vote Act Grants Awarded to the Commonwealth of the Northern Mariana Islands](#) in a September 2023 report titled [U.S. Territory Experiences Could Inform Future Federal Relief](#) and CIGIE highlighted our recent [Management Challenges report](#) in its [compilation report](#).

*Objective 3.2:* During the year, EAC OIG began reaching out to state auditor offices prior to conducting HAVA audits to determine if they have ongoing oversight work. As a result of these efforts, we removed New York from the HAVA audit contract because the state currently has ongoing work that could be potentially duplicative. EAC OIG also continued regular meetings with officials from the U.S. Government Accountability Office and CIGIE. As a result, the Office was able to avoid overlapping efforts, as well as stay abreast on issues impacting Offices of Inspectors General. EAC OIG also entered into interagency agreements for services with Department of Interior OIG and Department of State OIG.

## Semiannual Reporting Requirements

In December 2022, amendments to Section 5 of the Inspector General Act were codified in 5 U.S.C Section 405. The following table lists the amended requirements and corresponding page numbers where a requirement is addressed in this report. We also note requirements where we have nothing to report.

Paragraph Number	Description of Requirement	Page in report
1	Description of significant problems, abuses, deficiencies related to the administration of programs and operations of the establishment and associated reports and recommendations for corrective action made by the office.	Nothing to report
2	Identification of each recommendation made before the reporting period, for which corrective action has not been completed, including the potential cost savings associated with the recommendation.	10-12
3	Summary of significant investigations closed during the reporting period.	Nothing to report
4	Total number of convictions during the period resulting from investigations.	Nothing to report
5	Information regarding each audit, inspection, or evaluation report issued during the reporting period, including (a) a listing of each audit, inspection, or evaluation; (b) if applicable, the total dollar value of questioned costs (including a separate category for the dollar value of unsupported costs) and the dollar value of recommendations that funds be put to better use, including whether a management decision had been made by the end of the reporting period.	2-5, 9
6	Information regarding any management decision made during the reporting period with respect to any audit, inspection, or evaluation issued during a previous reporting period.	9
7	Information described under Section 804(b) of the Federal Financial Management Improvement Act of 1996.	Nothing to report
8	An appendix containing the results of any Peer Review of EAC OIG conducted by another OIG during the reporting period; or if no peer review was conducted within that reporting period, a statement identifying the date of the last peer review conducted by another OIG.	12-13
9	List of any outstanding recommendations from any Peer Review of EAC OIG.	Nothing to report
10	Status of Peer Reviews conducted by EAC OIG and why implementation is not complete.	13
11	Statistical tables showing the total number of investigative reports, persons referred to DOJ for criminal prosecution, persons referred to State and local for criminal prosecution, referrals, and indictments.	Nothing to report
12	Description of the metrics used for developing the statistical tables.	Nothing to report
13	Report on each investigation where allegations of misconduct were substantiated involving a senior government employee or senior official; the facts, circumstances of the investigation; and the status and	Nothing to report

Paragraph Number	Description of Requirement	Page in report
	disposition of the matter, including if it was referred to DOJ, date of the referral, and if declined by DOJ, date of declination,	
14	Description of any instance of whistleblower retaliation, including consequences the establishment actually imposed to hold the official accountable.	Nothing to report
15	Information related to interference by the establishment, including a detailed description of any attempt by the establishment to interfere with the independence of the Office, including with budget constraints designed to limit the capabilities of the Office; and incidents where the establishment has resisted or objected to oversight activities of the Office or restricted or significantly delayed access to information, including the justification of the establishment for such action and a summary of each report made to the head of the establishment under Section (6)(c) (2) during the reporting period.	Nothing to report
16	Detailed descriptions of the circumstances of each inspection, evaluation, and audit conducted by the Office that is closed and was not disclosed to the public and any investigation conducted by the office involving a senior government employee that is closed and was not disclosed to the public.	Nothing to report



U.S. Election Assistance Commission  
633 3rd Street NW, Suite 200  
Washington, DC 20001

December 1, 2023

Brianna Schletz, Inspector General  
U.S. Election Assistance Commission  
633 3rd Street NW, Suite 200  
Washington, DC 20001

Dear Inspector General Schletz:

The Election Assistance Commission (EAC) appreciates the opportunity to respond to the Office of Inspector General (OIG) Semiannual Report to Congress covering April 1, 2023, to September 30, 2023. The Commission supports both election officials and voters as we work to protect the integrity of U.S. elections and national security interests in accurate and secure elections. With preparations for the 2024 election cycle well underway, the EAC greatly appreciates the opportunity to strengthen Commission operations through OIG review.

Through Congressional appropriations, the Help America Vote Act (HAVA) Election Security Grant funds administered by the EAC support states and territories for the purpose of “improv[ing] the administration of elections for federal office, including to enhance election technology and make election security improvements.” Both the Risk Assessment of EAC’s Grant Closeout Procedures and audits of the administration of payments received under HAVA have aided the EAC Office of Grants Administration in identifying areas of additional efficiencies. The Commission is committed to ensuring Congressional appropriations are spent appropriately. As a result, the EAC Office of Grants Administration has made it a priority to increase technical assistance and training to grantees, especially in the form of capacity building with territorial grant recipients.

OIG Audits, Inspections, and Evaluations also strengthen internal Commission operations. The EAC is happy to report total compliance with the Payment Integrity Information Act for Fiscal Year 2022 and is appreciative of the insight on strengthening compliance with the Federal Information Security Modernization Act. The EAC takes OIG recommendations very seriously and is actively prioritizing all open recommendations.

The EAC is committed to supporting voters and election officials through the 2024 election cycle. Over the coming months, our ongoing work with election officials and trusted federal partners will intensify as we work to protect the integrity of U.S. elections. The Commission will ensure that both Congress and the EAC OIG are informed of all work conducted by the EAC. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Christy McCormick". The signature is written in a cursive, flowing style.

Christy McCormick, EAC Chairwoman



Visit our website at [oig.eac.gov](https://oig.eac.gov).

U.S. Election Assistance Commission  
Office of Inspector General  
633 3rd Street, NW, Second Floor  
Washington, DC 20001

**Report Waste, Fraud, and Abuse**  
[eacoig@eac.gov](mailto:eacoig@eac.gov) | [Online Complaint Form](#)