



---

**U.S. OFFICE OF PERSONNEL MANAGEMENT  
OFFICE OF THE INSPECTOR GENERAL  
OFFICE OF AUDITS**

---

# **Final Audit Report**

**Audit of the 2017 Combined Federal Campaign**

**Report Number 3A-CF-00-19-031**

**June 18, 2020**

A photograph of a sign for the Office of Personnel Management. The sign is rectangular and mounted on a post. It features the text "OFFICE OF PERSONNEL MANAGEMENT" in a serif font. The background of the sign is light-colored with a dark border. The sign is positioned in front of a building with large windows and trees. The image is slightly faded and serves as a background for the lower portion of the report cover.

**OFFICE OF  
PERSONNEL MANAGEMENT**

# EXECUTIVE SUMMARY

## *Audit of the 2017 Combined Federal Campaign*

Report No. 3A-CF-00-19-031

June 18, 2020

### **Why Did We Conduct the Audit?**

The objective of the audit was to determine if the 2017 Combined Federal Campaign (CFC) complied with the terms of Contract Number OPM1616C0001 (Contract) and Federal regulations.

### **What Did We Audit?**

The U.S. Office of Personnel Management's (OPM) Office of the Inspector General (OIG) has completed a performance audit of the 2017 CFC. Our audit consisted of a review of the CFC's cash management, campaign expenses, charity applications, and Quality Assurance Surveillance Plan. Our site visit was conducted from April 29 through May 3, 2019, at the Give Back Foundation's office in Madison, Wisconsin. Additional audit work was completed at our offices in Washington, D.C.; Jacksonville, Florida; and Cranberry Township, Pennsylvania.



---

**Michael R. Esser**  
*Assistant Inspector General  
for Audits*

### **What Did We Find?**

Our audit found that the Give Back Foundation's 2017 CFC operations complied with the terms of the Contract and Federal regulations. However, our audit identified two findings related to OPM's administration of the 2017 CFC that require corrective actions, as follows:

1. Our review of the campaign's cash management activities identified \$176,490 in miscellaneous funds that remained in the 2017 CFC contributions account but should have been transferred to the CFC project charity fees account to offset future distribution fees; and
2. Our review of the campaign's Quality Assurance Surveillance Plan identified several performance standards that were not measurable, were unable to be assessed, or did not have clear penalty amounts defined.

No exceptions were identified from our reviews of the campaign expenses and charity applications.

# ABBREVIATIONS

<b>CCA</b>	<b>Combined Campaign Administrator</b>
<b>CFC</b>	<b>Combined Federal Campaign</b>
<b>Contract</b>	<b>Contract Number OPM1616C0001</b>
<b>OCFC</b>	<b>Office of the Combined Federal Campaign</b>
<b>OIG</b>	<b>Office of the Inspector General</b>
<b>OPM</b>	<b>U.S. Office of Personnel Management</b>
<b>QASP</b>	<b>Quality Assurance Surveillance Plan</b>
<b>TASC</b>	<b>Total Administrative Services Corporation</b>

# TABLE OF CONTENTS

	<u>Page</u>
<b>EXECUTIVE SUMMARY</b> .....	i
<b>ABBREVIATIONS</b> .....	ii
<b>I. BACKGROUND</b> .....	1
<b>II. OBJECTIVES, SCOPE, AND METHODOLOGY</b> .....	3
<b>III. AUDIT FINDINGS AND RECOMMENDATIONS</b> .....	7
<b>A. CASH MANAGEMENT REVIEW</b> .....	7
1. Handling of Miscellaneous Funds .....	7
<b>B. CAMPAIGN EXPENSES REVIEW</b> .....	8
<b>C. CHARITY APPLICATIONS REVIEW</b> .....	8
<b>D. QUALITY ASSURANCE SURVEILLANCE PLAN REVIEW</b> .....	9
1. Oversight of the Quality Assurance Surveillance Plan .....	9
 <b>APPENDIX A</b> (TASC’s Response to the Draft Report, on behalf of The Give Back Foundation, dated March 27, 2020)	
 <b>APPENDIX B</b> (The OCFC’s Response to the Draft Report, dated March 30, 2020)	
 <b>REPORT FRAUD, WASTE, AND MISMANAGEMENT</b>	

# I. BACKGROUND

This report details the results of our audit of the 2017 Combined Federal Campaign (CFC). The audit was conducted pursuant to the provisions of Contract Number OPM1616C0001 (Contract) between the U.S. Office of Personnel Management (OPM) and the Give Back Foundation. The audit was performed by OPM's Office of the Inspector General (OIG), as established by the Inspector General Act of 1978, as amended.

The CFC is the world's largest and most successful annual workplace charity campaign, raising millions of dollars each year. The CFC was originally established by Executive Order 10927 in 1961. In 2011, OPM formed the CFC-50 Commission to ensure the program's continued growth and success. As a result of the Commission's recommendations new regulations governing the CFC were established, in effect revamping the CFC beginning with the 2017 campaign (campaigns are defined by the period in which donations were initially solicited).

Executive Orders 12353, 12404, and 13743 establish a system for administering an annual charitable solicitation drive among Federal civilian and military employees and annuitants. Title 5, Code of Federal Regulations, Part 950, the regulations governing the CFC, sets forth ground rules under which charitable organizations may receive donations from the CFC.

The CFC is organized into 36 geographic regions, called CFC zones, located throughout the United States, including Puerto Rico and the Virgin Islands, as well as other overseas locations. OPM's Office of the Combined Federal Campaign (OCFC) has the responsibility for management of the CFC. This responsibility includes publishing regulations, memoranda, and other forms of guidance to Federal offices and private organizations to ensure that all campaign objectives are achieved.

The central fiscal and administrative functions of the CFC are handled by the Central Campaign Administrator (CCA). On December 31, 2015, the OCFC awarded the CCA Contract to Give Back Foundation, a 501(c)(3) organization located in Madison, Wisconsin. In March 2014, the Give Back Foundation entered into an exclusive partnership with the Total Administrative Services Corporation (TASC), which gave TASC financial responsibility for the Give Back Foundation's operating cost so the Give Back Foundation could maximize the percentage of dollars donated to charities. TASC, as a subcontractor, runs the day-to-day administrative functions of the CFC on behalf of the Give Back Foundation. The Give Back Foundation manages the contracting relationship with OPM.

The CCA is responsible for:

- Developing and maintaining a centralized web site for the CFC that includes online functionality for charity applications and donor pledges; and
- Receiving and disbursing donor funds received from Federal payroll offices and service providers.

For each CFC zone, OPM establishes a Local Federal Coordinating Committee for the purpose of governing that zone's campaign. It will be the responsibility of the Federal Executive Board or lead agency (as identified by OPM) in the zone to ensure an active and diverse membership. A Local Federal Coordinating Committee is responsible for oversight of the CFC in each zone and assists the OCFC with charity application reviews. The Local Federal Coordinating Committee is also responsible for:

- Maintaining minutes of its meetings and responding promptly to any request from the OCFC;
- Ensuring that potential donors are not coerced to participate in the CFC;
- Providing instructions to employees regarding the donation process;
- Selecting an Outreach Coordinator to conduct marketing activities, arrange for events such as charity fares, and educate charities and donors regarding the program;
- Reviewing, approving, and providing authorization to the CCA for payments to the Outreach Coordinator; and
- Reviewing the performance of the Outreach Coordinators to ensure compliance with the CFC regulations and the Local Federal Coordinating Committee agreements with the Outreach Coordinators.

The results of our audit were discussed with the OCFC and Give Back Foundation officials at an exit conference on January 9, 2020. In addition, a draft report, dated February 28, 2020, was provided to the OCFC and the Give Back Foundation for review and comment. The OCFC's and the Give Back Foundation's responses to the draft report were considered in preparing the final report and are included as Appendices.

This is the first audit of the CFC under the new regulations that began with the 2017 campaign.

## II. OBJECTIVES, SCOPE, AND METHODOLOGY

### **OBJECTIVES**

The main objective of the audit was to determine if the 2017 CFC complied with the terms of the Contract and Federal regulations.

Our specific audit objectives were to determine if:

#### **Cash Management Review**

- Pledges, receipts, and disbursements from donors were accurately recorded and distributed to charities.

#### **Campaign Expenses Review**

- The CCA was reimbursed in accordance with the contractual requirements.
- Payments to the Outreach Coordinators were properly approved by the OCFC.
- The distribution fee was properly calculated.

#### **Charity Applications Review**

- Application and listing fees were in compliance with the Contract and Federal regulations.
- Applications were complete and satisfied the eligibility requirements for charities and federations.

#### **Quality Assurance Surveillance Plan Review**

- The Quality Assurance Surveillance Plan (QASP) standards were properly measured, reported, and penalties were assessed by OPM where necessary.

### **SCOPE AND METHODOLOGY**

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and

conclusions based on the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objectives.

This performance audit included a review of the cash management, campaign expenses, charity applications and QASP for the 2017 Campaign. As part of our survey work, we conducted a site visit at the Give Back Foundation’s office in Madison, Wisconsin from April 29 through May 3, 2019. The audit fieldwork was completed at our offices in Washington, D.C.; Jacksonville, Florida; and Cranberry Township, Pennsylvania from September 26, 2019, through January 9, 2020.

The Give Back Foundation collected receipts, of which 100 percent were donated by participating Federal civilian and military employees, and Federal annuitants, through payroll allotments, in addition to withholding fees and paying disbursements as follows:

<b>2017 Campaign Year</b>	
<b>Receipts</b>	\$ 91,275,418 <sup>1</sup>
<b>Disbursements</b>	\$ 74,384,682 <sup>2</sup>
<b>Fees</b>	\$ 16,724,727

In planning and conducting the audit, we obtained an understanding of the Give Back Foundation’s internal control structure to help determine the nature, timing, and extent of our auditing procedures. This was determined to be the most effective approach to select areas of audit. For those areas selected, we primarily relied on substantive tests of transactions and not tests of controls. Based on our testing, we did not identify any significant matters involving the Give Back Foundation’s internal control structure and its operation other than what was questioned in this report. However, since our audit would not necessarily disclose all significant matters in the internal control structure, we do not express an opinion on the Give Back Foundation’s system of internal controls taken as a whole.

We also conducted tests to determine whether the OCFC and the Give Back Foundation had complied with the Contract, applicable laws, and regulations governing the CFC Program.

---

<sup>1</sup> Amount includes funds that were not disbursed and were reclassified as miscellaneous funds that would be used to offset future year fees.

<sup>2</sup> Amount includes \$10,481 related to payment reconciliation issues that had been paid to the charities in error. The CCA decided to fund this disbursement instead of recovering from the charities.



Exceptions noted in the areas reviewed are set forth in the “Audit Findings and Recommendations” section of this report. With respect to the items not tested, nothing came to our attention that caused us to believe that the OCFC and the Give Back Foundation had not complied, in all material respects, with those provisions.

In conducting our audit, we relied to varying degrees on computer-generated data provided by the OCFC and the Give Back Foundation. Due to time constraints, we did not verify the reliability of the data generated by the various information systems involved. However, while utilizing the computer-generated data during audit testing, nothing came to our attention to cause us to doubt its reliability. We believe that the data was sufficient to achieve our audit objectives.

To determine if the OCFC and the Give Back Foundation complied with the terms of the Contract and Federal regulations as it relates to the 2017 CFC, we performed the following audit steps:

#### **Cash Management Review**

- Randomly sampled 25 donors, totaling \$62,625 in pledges, from a universe of 170,087 donors totaling \$101,686,189 in pledges, to determine if the sampled pledges were accurately recorded, if the donations were accurately received and if the disbursements were properly distributed to the charities.
- Reconciled the receipts, disbursements, and fees reported by the CCA to supporting documentation to ensure they were accurately reported.

#### **Campaign Expenses Review**

- Reconciled the CCA’s reimbursement of expenses to the amounts authorized by OPM in the Contract to ensure that the expenses were accurately paid.
- Verified the Outreach Coordinator payments by tracing the amounts to bank statements to ensure that the payments were accurately reported.
- Reconciled the Outreach Coordinator payments to OPM approvals to ensure that all payments were properly approved.
- Recalculated the application, listing, and distribution fees to determine if the amounts were correct.

### **Charity Applications Review**

- Randomly sampled 30 charity applications with total fees of \$2,732,450, from a universe of 4,806 applications with total fees of \$8,974,711, to ensure that the charities were properly approved by OPM, charged the correct fees, and were eligible to participate in the CFC based on applicable Federal regulations.

### **Quality Assurance Surveillance Plan Review**

- Reviewed the QASP results to determine if the standards were met and if any penalties were properly paid.

The samples that were selected and reviewed in performing the audit were not statistically based. Consequently, the results could not be projected to the universe since it is unlikely that the results are representative of the universe taken as a whole.

# III. AUDIT FINDINGS AND RECOMMENDATIONS

## A. CASH MANAGEMENT REVIEW

### 1. Handling of Miscellaneous Funds

\$176,490

We determined that \$176,490 in miscellaneous funds remained in the 2017 CFC contributions account and were not transferred to the CFC project charity fees account to offset future distribution fees.

**\$176,490 in miscellaneous funds were sitting idle in the 2017 CFC contributions account**

5 CFR 950.801 requires a zero account balance at the end of each campaign's disbursement period. Furthermore, OPM OCFC guidelines for the Treatment of Miscellaneous Funds by the CFC states, "there are certain times when funds donated to the CFC may become a miscellaneous contribution ... [and] the [OCFC] shall instruct the CCA to use the funds to benefit all CFC charities ... through either a special distribution or a rebate to offset distribution fees ... ."

The transfer of these funds did not occur because the OCFC did not have adequate policies or procedures in place to instruct the Give Back Foundation to timely transfer miscellaneous funds to the proper account. The last disbursement date for the 2017 campaign was March 15, 2019. The CCA uses the CFC project charity fees account to collect distribution fees. The CCA is required to transfer these miscellaneous funds from its CFC contributions account to its CFC project charity fees account. The CCA reported that the OCFC did not communicate, or issue a timeframe in its guidelines addressing when to move the funds to the CFC project charity fees account. The CCA is working with the OCFC to properly account for these funds and use them to offset future distribution fees.

Failure to have adequate policies and procedures for the timely handling of miscellaneous funds could result in a loss or misuse of contributions that would otherwise be used to offset distribution fees.

#### Recommendation 1

We recommend that the OCFC instruct the CCA to transfer \$176,490 in 2017 miscellaneous funds from its CFC contributions account to its CFC project charity fees account in order to offset future distribution fees.

**OCFC Response:**

*The OCFC agrees with the recommendation.*

**CCA Response:**

*The CCA agrees with the recommendation.*

**Recommendation 2**

We recommend that the OCFC revise its guidelines for the “Treatment of Miscellaneous Funds by the CFC” to include a timeframe for moving miscellaneous funds from the CFC contributions account to the CFC project charity fees account in order to offset future distribution fees.

**OCFC Response:**

*The OCFC agrees with the recommendation.*

**CCA Response:**

*The CCA agrees with the recommendation.*

**B. CAMPAIGN EXPENSES REVIEW**

The results of our review showed that the Give Back Foundation correctly charged costs related to the campaign in accordance with the Contract and Federal regulations.

**C. CHARITY APPLICATIONS REVIEW**

The results of our review showed that the Give Back Foundation and the OCFC correctly reviewed and approved charity applications and fees in accordance with the terms of the Contract and Federal regulations.

## D. QUALITY ASSURANCE SURVEILLANCE PLAN REVIEW

### 1. Oversight of the Quality Assurance Surveillance Plan

Procedural

During our review of the QASP reports for calendar years 2017 and 2018 (those reports that mostly related to the 2017 Campaign) we noted four areas of concern for which we recommend program improvements to the OCFC going forward. Specifically, those areas of concern are:

- The OCFC has no formal procedures in place for the review of the QASP results and reporting back to the CCA;
- The “at-risk” penalty amount for missing a performance standard is not defined and is unknown to both the OCFC and CCA;
- The standards related to "Responsiveness to OPM" are quantified and reported by the CCA, but an independent assessment is not conducted by the OCFC; and
- Some of the standards we reviewed are not applicable to the CCA or the data utilized skews the results.

**The OCFC does not have policies and procedures in place to effectively manage the QASP.**

Federal Acquisition Regulations 37.601(b) requires the Contract to include measurable performance standards (i.e., in terms of quality, timeliness, quantity, etc.), the method of assessing contractor performance against performance standards, and performance incentives/penalties, where appropriate. Furthermore, standard business practice for measuring agreed upon quality standards should include components, such as, documenting and communicating the results to the contractor, assessing any penalties due and modifying future standards, as necessary.

#### **Formalizing QASP Review and Reporting Procedures**

The OCFC stated that it has no formal procedures in place for the review and assessment of the QASP reports. The OCFC procedures consist of comparing the year-end results to the QASP standards. At no point during the assessment process are the performance results communicated to the CCA to determine if penalties should be assessed. Due to a lack of procedures, our audit determined the OCFC was unaware that the CCA failed to meet a QASP standard in calendar year 2018.

### **At-Risk Penalty Amount Not Formalized**

The Contract states that the offeror will specify how the at-risk penalty amount will be calculated for each minimum acceptable quality level. However, neither the CCA nor the OCFC provided an explanation as to how penalties would be calculated or assessed when one or more standard is not met. The process for calculating and assessing penalties should be formalized and included in the Contract. Currently, the Contract does not include requirements for calculating and assessing penalties.

### **Responsiveness to OPM Standards**

Our review found that the standards related to "Responsiveness to OPM" were both quantified and reported by the CCA, but not by the OCFC. Standard business practices include independent processes, such as performing assessments and reporting on a contractor's performance based on clearly established contractual guidelines. As a result of the OCFC not conducting an assessment, an independent assessment is missing, leaving only a potentially biased assessment of the standards by the CCA that could result in an improper and inaccurate performance assessment.

### **Standards Not Applicable to the CCA or the Data Used Skews the Results**

We identified three standards that could not be quantified, making it difficult for the CCA to be accountable for the standards. Specifically, we determined the following:

- The CCA did not report on standards related to campaign financial (i.e., QASP 4.2) and charity pledge (i.e., QASP 5.2) reports. These reports are available to the charities through an online system provided by the CCA.
- In 2017 and 2018, the CCA did not meet customer satisfaction standards (i.e., QASP 1.3) and performance penalties were not applied. The OCFC did not assess CCA penalties for this standard due to many charities being dissatisfied with the new CFC structure and the feedback collected included responses from the charities. The OCFC views the donors as the end customers of the CFC, and believes including charity responses negatively skews the CCA's performance results.
- The OCFC stated that it could not track innovation standards (i.e., QASP 6.4) because the standard is not measurable.

Because of the issues identified above, the CCA's quality of service may be adversely affected, penalties may not be identified or assessed by the OCFC, and the CCA is not formally informed about program deficiencies that would require correction. We recognize

during the initial years of the new CFC program performance standards will need to be reviewed and changed to accommodate the new CCA requirements. However, performance standards must be measurable and encompass areas of contractor performance as required by Federal regulations.

### **Recommendation 3**

We recommend that the OCFC develop and implement written procedures for its review and assessment of the QASP reports, including steps to formally notify the CCA of the QASP results, any applicable penalties due, and its expectations going forward.

#### **OCFC Response:**

*The OCFC agrees with the recommendation.*

#### **CCA Response:**

*The CCA agrees with the recommendation.*

### **Recommendation 4**

We recommend that the OCFC formally document the method of collecting and assessing penalties by modifying the Contract to incorporate the above deficiencies.

#### **OCFC Response:**

*The OCFC agrees with the recommendation.*

#### **CCA Response:**

*The CCA agrees with the recommendation.*

### **Recommendation 5**

We recommend that the OCFC direct the CCA to no longer report on QASP 6.3 (General Working Relationship) of the Responsiveness to OPM standards, and that the OCFC include its assessment of the CCA's performance in that area as part of its QASP review memorandum as mentioned in Recommendation 3 above.

**OCFC Response:**

*The OCFC partially agrees with the recommendation. The OCFC states that it “is drafting procedures to review and provide feedback to the CCA regarding the QASP reports. However, [the OCFC] believes some aspects currently included in the Responsiveness to OPM Standards [section] should remain in the QASP section.”*

**CCA Response:**

*The CCA agrees with the recommendation.*

**OIG Comment:**

After further review, we agree with the OCFC’s response regarding keeping some aspects that are currently in the “Responsiveness to OPM Standards” section and have limited our recommendation to QASP 6.3.

**Recommendation 6**

We recommend that the OCFC review all QASP standards to ensure they are trackable, applicable, and are supportable. The OCFC should conduct a formal contract modification documenting any changes.

**OCFC Response:**

*The OCFC agrees with the recommendation.*

**CCA Response:**

*The CCA agrees with the recommendation.*

**Recommendation 7**

We recommend that the OCFC remove standard QASP 6.4, “Innovation,” since it is not measurable.

**OCFC Response:**

*The OCFC agrees with the recommendation.*



**CCA Response:**

*The CCA agrees with the recommendation.*

# Appendix A



[On behalf of Give Back Foundation]

March 27, 2020

██████████  
U.S. Office of Personnel Management Office of the Inspector General

**Regarding: Draft Audit Report of the 2017 CFC (3A-CF-00-19-031)**

Dear Mr. ██████,

In connection with your audit to report on the 2017 Combined Federal Campaign (CFC), TASC has reviewed the report and agrees with the findings and recommendations:

- *Recommendation 1:* We concur
- *Recommendation 2:* We concur
- *Recommendation 3:* We concur
- *Recommendation 4:* We concur
- *Recommendation 5:* We concur
- *Recommendation 6:* We concur
- *Recommendation 7:* We concur

[INFORMATION DELTED BY OIG – NOT RELEVANT TO THE FINAL REPORT]

If you have any questions or concerns, please contact me at (608) 316-██████ or ██████████ at (608) 316-██████.

Sincerely,

██████████  
██████████ |e-signed-dat|  
EVP - Enterprise Risk Management

CC: ██████████

TASC | 2302 International Lane | Madison, WI 53704-3140 | 800-422-4661 | [www.tasconline.com](http://www.tasconline.com)

*The information in this communication is confidential and may be used by the authorized recipient only for its intended purpose only.  
Any other use or disclosure is prohibited.*

Report No. 3A-CF-00-19-031

# Appendix B



Merit System  
Accountability  
and Compliance

## UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

March 30, 2020

MEMORANDUM FOR:

██████████  
Chief, Special Audits Group  
Office of the Inspector General

FROM:

KEITH WILLINGHAM *Keith Willingham*  
Director, Office of Combined Federal Campaign  
Merit System Accountability and Compliance

SUBJECT:

Audit of the 2017 Combined Federal Campaign  
(Report No. 3A-CF-00-19-031)

Thank you for providing OPM the opportunity to respond to the Office of the Inspector General (OIG) draft report, Audit of the 2017 Combined Federal Campaign, Report No. 3A-CF-00-19-031.

Responses to your recommendations including planned corrective actions, as appropriate, are provided below.

**Recommendation 1:** We recommend that the OCFC instruct the CCA to move \$176,490 of miscellaneous funds from its 2017 CFC Contributions account to the CFC Project Charity Fees account in order to offset future distribution fees.

**We concur.** The Central Campaign Administrator (CCA) has been directed to move 2017 miscellaneous funds in order to offset distribution fees.

**Recommendation 2:** We recommend that the OCFC revise its guidelines for the “Treatment of Miscellaneous Funds by the CFC” to include a timeframe for moving miscellaneous funds from the CFC Contributions account to the CFC Project Charity Fees account in order to offset future distribution fees.

**We concur.** OCFC is updating its guidance to include a timeframe for moving miscellaneous funds in order to offset future distribution fees or other cost.

**Recommendation 3:** We recommend that the OCFC develop and implement written procedures for its review and assessment of the QASP reports, including steps to formally notify the CCA of the QASP results, any applicable penalties due, and its expectations going forward.

**We concur.** OCFO is drafting formal procedures for its review and assessment of the QASP reports submitted by

Performance Work Statement relating to central campaign administration services. An updated quality assurance surveillance plan will be part of that review process.

**Recommendation 4:** We recommend that the OCFC formally document the method of collecting and assessing penalties by modifying the Contract to incorporate the above deficiencies.

**We concur.** OCFO is drafting formal procedures for its review and assessment of the QASP reports submitted by the CCA. The procedures will include the method of collecting and assessing penalties. OCFC is consulting with the Office of Procurement Operation on a plan to modify the contract if necessary.

**Recommendation 5:** We recommend that the OCFC direct the CCA to no longer report on the “Responsiveness to OPM” standards of the QASP and that the OCFC include its assessment of the CCAs performance in that area as part of its QASP review memorandum as mentioned in Recommendation 3 above.

**We partially concur.** OCFO is drafting procedures to review and provide feedback to the CCA regarding QASP reports. However, we believe some aspects currently included in the Responsiveness to OPM standards should remain in the QASP section. OCFC will continue working with the Office of Procurement Operation to improve the quality assurance surveillance plan.

**Recommendation 6:** We recommend that the OCFC review all QASP standards to ensure they are trackable, applicable, and are supportable. The OCFC should conduct a formal contract modification documenting any changes.

**We concur.** OCFO is working with the Office of Procurement Operation on an acquisition plan and updated Performance Work Statement relating to central campaign administration services. An updated quality assurance surveillance plan will be part of that review process.

**Recommendation 7:** We recommend that the OCFC remove standard QASP 6.4, “Innovation”, since it is unmeasurable.

**We concur.** OCFO will work with the Office of Procurement Operation and review and update the quality assurance surveillance plan. This includes removing the innovation requirement or rewording to something that is more clearly measurable.

I appreciate the opportunity to respond to this draft report. If you have any questions regarding our response, please contact [REDACTED], at (202) 606-[REDACTED].



## **Report Fraud, Waste, and Mismanagement**

Fraud, waste, and mismanagement in Government concerns everyone: Office of the Inspector General staff, agency employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and mismanagement related to OPM programs and operations. You can report allegations to us in several ways:

**By Internet:** <http://www.opm.gov/our-inspector-general/hotline-to-report-fraud-waste-or-abuse>

**By Phone:** Toll Free Number: (877) 499-7295  
Washington Metro Area: (202) 606-2423

**By Mail:** Office of the Inspector General  
U.S. Office of Personnel Management  
1900 E Street, NW  
Room 6400  
Washington, DC 20415-1100