



Audit Report



OIG-06-033

FOREIGN ASSETS CONTROL: Assessing OCC's Examination of OFAC Compliance Was Hampered by Limited Documentation

July 31, 2006

Office of
Inspector General
Department of the Treasury

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Abbreviations

AML	Anti-Money Laundering
BSA	Bank Secrecy Act
FFIEC	Federal Financial Institutions Examination Council
OCC	Office of the Comptroller of the Currency
OFAC	Office of Foreign Assets Control
OIG	Office of Inspector General

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*The Department of the Treasury
Office of Inspector General*

July 31, 2006

John C. Dugan
Comptroller
Office of the Comptroller of the Currency

As a follow-up to a previous OIG report,¹ we conducted an audit of the Office of Foreign Assets Control's (OFAC) administration and enforcement of economic sanctions against targeted foreign countries, individuals, and groups. OFAC acts under presidential wartime and national emergency powers, as well as authority granted by specific legislation, to impose controls on transactions and freeze foreign assets under U.S. jurisdiction. OFAC sanctions are enforced largely by financial institutions. Because OFAC is legally limited in its ability to monitor financial institutions' compliance with foreign sanction requirements,² it depends on financial institution regulators, such as the Office of the Comptroller of the Currency (OCC), to ensure that financial institutions comply with OFAC requirements. Accordingly, as part of our audit, we tested regulatory oversight of OFAC compliance for a sample of financial institutions to determine whether OFAC's foreign sanctions programs were being effectively administered. This report presents the results of our review of OCC compliance examinations.

We conducted our audit from March 2005 to April 2006 in accordance with generally accepted government auditing standards. A more detailed description of our objective, scope and methodology is included in appendix 1.

¹ *FOREIGN ASSETS CONTROL: OFAC's Ability to Monitor Financial Institution Compliance Is Limited Due to Legislative Impairments* (OIG-02-082, April 26, 2002).

² Section 3412 (d) of the Right to Financial Privacy Act (12 U.S.C. 3401) allows supervisory agencies to exchange examination information with other supervisory agencies. OFAC is not included in this Act's list of supervisory agencies [§ 3401(7)].

Results In Brief

OCC's examination work papers did not provide assurance that banks were adequately reviewing or effectively administering OFAC's sanctions programs. From a sample of 18 OCC examinations conducted in fiscal years 2002 through 2005, we found, for every examination, one or more instances in which documentation was insufficient to verify that examiners adequately assessed OFAC program compliance. Specifically, the OCC examination work papers did not always contain sufficient documentation to demonstrate that examiners fully assessed

- bank policies and procedures for its OFAC compliance program,
- bank comparisons of its accounts with OFAC listings,
- correspondence between the bank and OFAC, and
- results of internal bank audits for possible OFAC program concerns.

OCC's policy on supervisory work papers states that examiners should generate and retain only those documents necessary to support the scope of supervisory activity, significant conclusions, rating changes, or changes in risk profile. We believe, however, that this policy makes it difficult to assess the adequacy of the review and creates inconsistency in how program results are documented. Guidelines recently issued by the Federal Financial Institutions Examination Council (FFIEC)³ should help ensure the consistency of examination coverage.

We are making recommendations to OCC to ensure that (1) the current OCC guidelines for OFAC compliance examinations incorporate the policies and procedures contained in the FFIEC BSA/AML Examination Manual and (2) examiners sufficiently and consistently document the work performed so that an independent reviewer can clearly see which

³ FFIEC, established under title X of the Financial Institutions Regulatory and Interest Rate Control Act of 1978, is a formal interagency body empowered to prescribe uniform principles, standards, and report forms for the examination of financial institutions by federal regulators. The members of FFIEC, in addition to OCC, are the Office of Thrift Supervision, the Federal Deposit Insurance Corporation, the Board of Governors of the Federal Reserve System, and the National Credit Union Administration.

procedures were performed and ascertain the basis for all significant conclusions, including changes to regulatory ratings and risk profiles.

OCC concurred with our recommendations. OCC has replaced its OFAC compliance examination procedures with the FFIEC *Bank Secrecy Act/Anti-Money Laundering Examination Manual*. OCC also intends to reinforce its documentation expectations with examining staff.

In OCC's response to our draft report, the Comptroller stated that OCC has taken major steps, individually, and as part of interagency initiatives to enhance BSA/AML processes, including OFAC compliance, in the past several years. He also said he is committed to these goals and personally directed further enhancements to these processes in the fall of 2005.

Background

OFAC's Mission and Sanctions Programs

The mission of OFAC, an office within the Department of the Treasury, is to administer and enforce economic and trade sanctions, based on U.S. foreign policy and national security goals, against targeted foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. All U.S. persons, including U.S. banks, bank holding companies, and nonbank subsidiaries must comply with OFAC regulations.

OFAC regulations involve blocking accounts and other assets of the specified countries, entities, and individuals and rejecting financial transactions with specified countries, entities, and individuals. If financial institutions fail to block or reject prohibited transactions, OFAC has the authority to impose civil monetary penalties against them.

OFAC sanctions can reach into virtually all areas of banking operations. Therefore, banks need to consider all types of transactions, products, and services when they conduct risk assessments and establish appropriate policies and procedures.

OCC Role in Ensuring Banks' Compliance with OFAC Regulations

The mission of OCC, which charters, regulates, and supervises all U.S. national banks, is to ensure a stable and competitive national banking system. OCC has the authority to examine banks and take supervisory actions against banks that do not comply with laws and regulations or that otherwise engage in unsound banking practices. As of September 30, 2005, OCC was responsible for regulating and supervising 1,933 national banks and 51 federal branches of foreign banks in the United States. National banks, as of June 30, 2005, held 67 percent (\$5.8 trillion) of the total assets of all U.S. commercial banks.

It is OCC's responsibility to ensure that national banks comply with OFAC regulations. However, none of the laws that authorize sanctions for OFAC violations contain specific language that delegates administrative enforcement responsibility to any of the financial institution regulatory agencies, including OCC. Consequently, OCC's OFAC enforcement responsibilities fall under its general examination responsibility to ensure that banks are following applicable laws and regulations.

OCC Examination Procedures for OFAC Compliance

In September 2000, OCC issued the *Bank Secrecy Act/Anti-Money Laundering Comptroller's Handbook*, which contains procedures for reviewing and assessing banks' OFAC compliance. According to the handbook, examiners should do the following:

- Review all OFAC-related correspondence
- Evaluate banks' OFAC policies and procedures
- Examine internal audits reports and management reviews involving OFAC compliance
- Verify that banks maintained a current and valid OFAC list⁴

⁴ OFAC periodically publishes a Specially Designated Nationals and Blocked Persons list of individuals and companies owned or controlled by, or acting for or on behalf, of targeted countries. The list also contains individuals, groups, and entities, such as terrorists and drug traffickers.

-
- Determine whether banks have procedures to ensure that new and existing accounts and transactions are compared with the OFAC list.

OCC Policies and Procedures Manual

The Bank Supervision section of the *OCC Policies and Procedures Manual*, dated October 23, 2002, addresses supervision work papers and states that the level of detail in work papers should be commensurate with the risks facing the institution. In most cases, the work papers need not include all of the data reviewed. Instead, the examiner should generate and retain only documents necessary to support the scope, significant conclusions, rating changes, or changes in a risk profile. Work papers do not typically need to address every objective and procedural step.

FFIEC Core Examination Procedures for OFAC Compliance

In June 2005, FFIEC released the *Bank Secrecy Act/Anti-Money Laundering Examination Manual* (BSA/AML Examination Manual). The manual includes core procedures for examiners to use to determine whether financial institutions are in compliance with OFAC sanctions programs. (See appendix 3.) According to the BSA/AML Examination Manual, financial institutions should use a risk-based approach when considering the likelihood of encountering possible OFAC violations.

The BSA/AML Examination Manual also states that transaction testing⁵ is a requirement to be accomplished as part of each examination. However, examiners are to use transactional testing in high risk areas identified in the bank's risk assessment. If OFAC is deemed a high risk area, the

⁵ As provided in the BSA/AML Examination Manual, examiners perform transaction testing to evaluate the adequacy of the bank's compliance with regulatory requirements, determine the effectiveness of its policies, procedures, and processes, and evaluate suspicious activity monitoring systems. Transaction testing, the manual states, is an important factor in forming conclusions about the integrity of the bank's overall controls and risk management processes and must be performed at each examination. The extent of transaction testing and activities where it is performed is based on various factors, including the examiner's judgment of risks, controls, and the adequacy of the independent testing by the bank's internal audit function. Once the examiner is on-site, the scope of the transaction testing can be expanded to address any issues or concerns identified during the examination.

examiners may choose to use transaction testing to evaluate the bank’s handling of new and established accounts, the effectiveness of interdict software if used, the handling of blocked transactions, or the resolution of false hits.

Audit Results

OCC’s examination work papers lacked sufficient documentation to assure that banks were adequately reviewing or administering OFAC sanctions programs. Our review of fiscal years 2002-5 examination results for the 18 banks revealed instances of inadequate documentation for significant examination steps. The following table summarizes the results of our review:

Table 1: Examinations Conducted in Fiscal Years 2002-5 with Insufficient Documentation

Examination Step	Number of Examinations
Assessment of policies and procedures	16
Assessment of effectiveness of bank comparisons to OFAC list	13
Review of OFAC correspondence	11
Review of internal bank audit results	9

Source: OIG analysis

For one examination, OCC did not provide any work papers to support the examination’s findings.

Our efforts to evaluate and verify the examiners’ conclusions were hampered by the lack of documentation. If examiners conclude that an institution is OFAC-compliant, OCC does not require that documentation covering all objectives and procedures as well as copies of bank policy documents be maintained and available to support their conclusions. As a result, documentation is often not available to allow an external reviewer to verify and assess the examiner’s conclusions. OCC management prefers that OCC resources be used to document and address conditions that result in noncompliance.

Description of Our Review

To assess OCC examinations of banks' compliance with OFAC regulations, we selected a sample of 18 bank examinations that OCC conducted in fiscal years 2002 through 2005. For our sample, we selected 3 banks that had prior OFAC violations – OFAC had imposed civil monetary penalties against 2 of these banks and issued a warning letter to the third.

The remaining 15 banks were selected from a stratified sample of banks based on asset size and distributed among the 4 OCC districts (western, central, southern, and northeastern). In total, we selected 3 large banks (assets from \$25 billion to \$999 billion), 5 medium banks (assets from \$1 billion to \$25 billion), and 10 small banks (assets from \$1 million to \$1 billion). We included 3 banks each from New York, California, and Texas as well as 2 banks each in Illinois and Missouri. The remaining 6 banks were located in New Jersey, Florida, Colorado, Indiana, and West Virginia.

For each of the 18 banks in our sample, we requested copies of the most recent OFAC compliance examination work papers. In addition, we requested copies of all documentation that may have affected the scope of the OFAC reviews.

Banks' Policies and Procedures for Determining OFAC Compliance Were Not Always Documented

Banks should have policies and procedures to ensure OFAC program compliance. For 16 of 18 examinations, OCC examiners reported that OFAC compliance was satisfactory, but we were unable either to confirm that the policies and procedures existed or to validate the examiners' summaries and conclusions. For 2 examinations, copies of the policies and procedures were in the examination work papers. OCC officials indicated that examiners need not maintain copies of a bank's policies and procedures and that it is considered sufficient to review them on-site.

OCC Examinations Lacked Evidence of Assessment of the Effectiveness of Bank Comparisons to OFAC List

In assessing banks' compliance with OFAC, OCC examiners generally note in their work papers the method a banks uses to compare accounts and transactions to OFAC lists of countries, entities, and individuals whose accounts, assets, or transactions are to be blocked or frozen. OCC examiners indicated that 13 of the 18 banks used OFAC interdict software to conduct their comparisons, but we did not find any evidence that examiners had assessed whether the software was effective or had been updated to include the most recent changes to the OFAC list.

For 2 of the other 5 banks, the examination work papers indicated that the banks compared accounts and transactions to the OFAC list manually. However, the work papers did not document whether the examiners determined if the banks' manual procedures were effective. For the remaining 3 banks, the examination work papers did not specify how comparisons were done.

We also evaluated whether OCC examiners verified that the banks compared accounts with the OFAC list. In 3 of the 18 examinations, there was no evidence that the examiners completed this procedure.

Examiners Did Not Always Document Reviews of OFAC-Related Correspondence

One of the initial procedures OCC examiners perform in examining banks' compliance with OFAC is to review any OFAC-related correspondence specific to the bank under examination. In 10 of the 18 examinations, OCC examiners did not document whether they conducted such a review. In 1 examination, the examiner indicated that the correspondence review was not conducted.

For the remaining 7 banks, the examiners documented their examination results. Five banks did not have any OFAC-related correspondence to review, while 2 banks had copies of issued OFAC penalties and warning letters.

Examiners Did Not Always Document Reviews of Internal Audit Reports

OCC examiners review banks' internal audit reports to determine whether banks have addressed any weaknesses identified in their OFAC compliance program reviews. Examiners' work papers for 9 of the 18 examinations contained insufficient evidence for us to determine whether the bank conducted internal audits that included a review of OFAC compliance. In 7 of these examinations, the banks conducted internal audits, but the OCC examiner did not document whether OFAC compliance was included in the scope of the audits. In the remaining 2 examinations, the examiners made no reference as to whether the bank had performed any type of internal audit or independent review.

Conclusions

The FFIEC BSA/AML Examination Manual provides guidance for ensuring that OFAC compliance examinations are uniform, comprehensive, and based on valid risk assessments. According to the manual, financial institution regulators such as OCC are to examine financial institutions to determine the adequacy of each institution's OFAC program and the effectiveness of its risk management. The examiners are to use the manual's appendix M, "Quantity of Risk Matrix—OFAC Procedures," to help determine the OFAC risk level of the institution under review. Based on their determination of risk from this matrix, as well as a review of prior examination reports and internal audit findings for the institution, the examiners are to select which policies and procedures to verify. We believe this process should be documented.

In a November 14, 2005, letter to the chairman of the Senate Committee on Banking, Housing and Urban Affairs, the Comptroller of the Currency indicated that OCC would change its supervisory process to address the increasing risk associated with BSA/AML compliance. Specifically, OCC would strengthen its BSA/AML examinations through (1) enhanced risk management; (2) application of the uniform examination procedures set forth in the BSA/AML Examination Manual, including mandatory transaction testing; and (3) timely and effective follow-up.

The Manual identifies the OFAC-related information that should be requested by the examiners in preparing for the examination. In addition,

the numerous examination procedures and the options available for transaction testing will necessitate that examiners exercise care in choosing appropriate procedures and transactions for testing. To ensure that the results of OFAC examinations are valid and reliable, examiners will need to identify the documentation reviewed and the work performed. The basis for significant conclusions reached should be sufficient to satisfy an independent reviewer.

Recommendations

We recommend that the Comptroller of the Currency do the following:

1. Ensure that the current OCC guidelines for OFAC compliance examinations incorporate the policies and procedures contained in the FFIEC BSA/AML Examination Manual.
2. Ensure examiners sufficiently and consistently document work performed so that an independent reviewer can clearly see which procedures were performed and ascertain the basis for all significant conclusions, including changes to regulatory ratings and risk profiles.

Management Response

OCC concurred with the first recommendation and reported that, as of June 2005, the FFIEC "Bank Secrecy Act/Anti-Money Laundering Examination Manual" has replaced the OCC-specific examination procedures for OFAC compliance. OCC agreed with the second recommendation and believes it is consistent with its current policy regarding work papers. OCC concluded that the level of exceptions noted in our audit report points to a need for improvement in practice. OCC will reinforce its expectations in this regard with examination staff.

OIG Comments

We believe that the actions OCC states in its response, if implemented as described, address the intent of our recommendations.

* * * * *

We would like to extend our appreciation to OCC personnel for the cooperation and courtesies extended to our staff during the reviews. If you have any questions, please contact me at (617) 223-8640.

/s/
Donald P. Benson
Director

Our objective was to determine the effectiveness of OCC examination efforts to ensure financial institution compliance with OFAC requirements. This audit was performed in conjunction with an audit of OFAC's administration and enforcement of economic sanctions against targeted foreign countries, individuals, and groups. Because OFAC is legally limited in its ability to monitor financial institutions' compliance with foreign sanction requirements, OFAC depends on financial institution regulators, such as the OCC, to ensure that the institutions comply with OFAC requirements.

We reviewed OCC work papers to determine whether the examiners followed the examination guidelines in the *OCC Bank Secrecy Act/Anti-Money Laundering Comptroller's Handbook*. The review focused on how OCC examiners identified each institution's OFAC policies and procedures and addressed the risks associated with ensuring OFAC compliance.

We judgmentally selected a sample of 18 banks, using asset size and geographic location as our main criteria. The sample examinations were conducted in fiscal years 2002 through 2005. Our sample included 3 banks that OFAC had reviewed for sanction violations. OFAC imposed civil monetary penalties against 2 of these banks and issued a warning letter to the third bank.

We requested copies of the most recent examination work papers and copies of all documentation that may have affected the scope of the OFAC reviews. The examination records were compiled by the OCC onto a computer CD ROM and were reviewed at our office. Because the work paper documentation appeared limited for some of the sampled examinations, we reconfirmed with the OCC audit liaison that the documentation provided represented all of the examination documentation that was available.

We also compared the OFAC compliance guidance in OCC's September 2000 *Bank Secrecy Act/Anti-Money Laundering Comptroller's Handbook* with FFIEC's June 2005 *Bank Secrecy Act/Anti-Money Laundering Examination Manual*.

Appendix 1
Objective, Scope, and Methodology

We conducted our audit from March 2005 to April 2006 in accordance with generally accepted government auditing standards.

Appendix 2
Major Contributors to This Report

Stephen Syriala, Audit Manager
Thomas Mason, Auditor-In-Charge
Esther Tepper, Communications Analyst
Horace Bryan, Referencer

Objective

Assess the bank's risk-based Office of Foreign Assets Control (OFAC) program to evaluate whether it is appropriate for the bank's OFAC risk, taking into consideration its products, services, customers, transactions, and geographic locations.

Procedures

1. Determine whether the board of directors and senior management of the bank have developed policies, procedures, and processes based on their risk assessment to ensure compliance with OFAC laws and regulations.
2. Regarding the risk assessment, review the bank's OFAC program. Consider the following:
 - The extent of, and method for, conducting OFAC searches of each relevant department/business line (e.g., automated clearing house (ACH), monetary instruction sales, check cashing, trusts, loans, deposits, and investments) as the process may vary from one department or business line to another.
 - The extent of, and method for, conducting OFAC searches of account parties other than accountholders, which may include beneficiaries, guarantors, principals, beneficial owners, nominee shareholders, directors, signatories, and power of attorney.
 - How responsibility for OFAC is assigned.
 - Timeless of obtaining and updating OFAC lists or filtering criteria.
 - The appropriateness of the filtering criteria used by the bank to reasonably identify OFAC matches (e.g., the extent to which the filtering/search criteria includes misspelling and name derivations).
 - The process used to investigate potential matches.
 - The process used to block and reject transactions.
 - The process used to inform management of blocked or rejected transactions.
 - The adequacy and timeliness of reports to OFAC.
 - The process to manage blocked accounts (such accounts are reported to OFAC and pay a commercially reasonable rate of interest).

- The record retention requirements (i.e., five year requirement to retain relevant OFAC records; for blocked property, record retention for as long as blocked; once unblocked, records must be maintained for five years).
3. Determine the adequacy of independent testing (audit) and follow-up procedures.
 4. Review the adequacy of the bank's OFAC training program based on the bank's OFAC risk assessments.
 5. Determine whether the bank has adequately addressed weaknesses or deficiencies identified by OFAC, auditors or regulators.

Transaction Testing

6. On the basis of a bank's risk assessment, prior examination reports, and a review of the bank's audit findings, select the following samples to test the bank's OFAC program for adequacy, as follows:
 - Sample new accounts (e.g., deposits, loan, trust, safe deposit, investments, credit cards, and foreign office accounts,) and evaluate the filtering process used to search the OFAC database (e.g., the timing of the search), and documentation maintained evidencing the searches.
 - Sample appropriate transactions that may not be related to an account (e.g., funds transfers, monetary instrument sales and check cashing transactions), and evaluate the filtering criteria used to search the OFAC database, the timing of the search, and documentation maintained evidencing the searches.
 - If the bank uses an automated system to conduct searches, assess the timing of when updates are made to the system, and when the most recent OFAC changes were made to the system. Also, evaluate whether all of the bank's databases are run against the automated system, and the frequency upon which searches are made. If there is any doubt regarding the effectiveness of the OFAC filter, then run tests of the system

by entering test account names that are the same as or similar to those recently added to the OFAC list to determine whether the system identifies a potential hit.

- If the bank does not use an automated system, evaluate the process used to check the existing customer base against the OFAC list and the frequency of such checks.
 - Review a sample of potential OFAC matches and evaluate the bank's resolution and blocking/rejecting processes.
 - Review a sample of reports to OFAC and evaluate their completeness and timeliness.
 - If the bank is required to maintain blocked accounts, select a sample and evaluate that the bank maintains adequate records of amounts blocked and ownership of blocked funds, that the bank is paying a commercially reasonable rate of interest on all blocked accounts, and that it is accurately reporting required information annually (by September 30th) to OFAC. Test the controls in place to verify that the account is blocked.
 - Pull a sample of false hits (potential matches) to check their handling; the resolution of a false hit should take place outside of the business line.
7. Identify any potential matches that were not reported to OFAC, discuss with bank management, advise bank management to immediately notify OFAC of unreported transactions, and immediately notify supervisory personnel at your regulatory agency.
 8. Determine the origin of deficiencies (e.g., training, audit, risk assessment, internal controls, management oversight,) and conclude on the adequacy of the bank's OFAC program.
 9. Discuss OFAC related examination findings with bank management.
 10. Include OFAC conclusions within the report of examination, as appropriate.



MEMORANDUM

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

To: Donald P. Benson, Director

From: John C. Dugan, Comptroller of the Currency

Handwritten signature of John C. Dugan in black ink.

Date: July 14, 2006

Subject: Comments on Draft Report

We appreciate the opportunity to offer comments on your draft audit report titled "Foreign Asset Control/Terrorist Financing/Money Laundering: Assessing OCC's Examination of OFAC Compliance Was Hampered by Limited Documentation." Your report is based upon a review of a sample of examinations conducted from 2002 through 2005. You concluded that the OCC's examination work papers lacked sufficient documentation to assure you that national banks were adequately reviewing or administering OFAC sanctions programs.

Let me note at the outset that the OCC has taken major steps, individually, and as part of inter-agency initiatives, to enhance its BSA/AML supervisory processes, including OFAC compliance, in the past several years. I am firmly committed to these goals, and I personally directed further enhancements to our BSA/AML processes last Fall. As I discuss below, I believe one of our major initiatives is directly responsive to one of your recommendations.

You make two recommendations and request a reply that describes actions taken and planned to address them.

First, you recommend that the OCC ensure that the current OCC guidelines for OFAC compliance examinations incorporate the policies and procedures contained in the FFIEC BSA/AML Examination Manual.

We fully concur with the recommendation and are pleased to report that corrective action was completed nearly a year ago. The FFIEC "Bank Secrecy Act/Anti-Money Laundering Examination Manual," issued in June 2005, replaced OCC-specific examination procedures for OFAC compliance. These procedures, developed on an interagency basis, were designed in part to promote consistency in examination coverage.

Second, you recommend that the OCC ensure examiners sufficiently and consistently document work performed so that an independent reviewer can clearly see which procedures were performed and ascertain the basis for all significant conclusions, including changes to regulatory ratings and risk profiles. We agree with this recommendation and believe it is consistent with

Appendix 4
Management Response

our current policy regarding work papers, although the level of exceptions noted in your report points to a need for improvement in practice. We will reinforce our expectations in this regard with our examining staff.

Thank you again for the opportunity to review your draft report and to respond to your recommendations.

Department of the Treasury

Under Secretary, Office of Terrorism and Financial Intelligence
Assistant Secretary, Terrorist Financing and Financial Crimes
Office of Strategic Planning and Performance Management
Office of Accounting and Internal Control

Office of Comptroller of the Currency

Comptroller

Office of Foreign Assets Control

Acting Director

Office of Management and Budget

OIG Budget Examiner