UNITED STATES COMMISSION ON CIVIL RIGHTS



SUMMARY OF PERFORMANCE AND FINANCIAL INFORMATION FOR FISCAL YEAR 2013

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MESSAGE FROM THE CHAIRMAN



I am pleased to present the Summary of Performance and Financial Information for the U.S. Commission on Civil Rights for Fiscal Year 2013. This report summarizes the agency's Performance and Accountability Report for Fiscal Year 2013. The full report is available on the agency's website at http://www.usccr.gov/congress/2013 PAR Report-Final.pdf).

I am proud of the Commission's FY 2013 performance, and look forward to building on its performance to continue to advance civil rights through objective and comprehensive investigation, research, and analysis on issues of fundamental concern to the federal government and the public.

Martin R. Castro

Chairperson

United States Commission on Civil Rights

March 31, 2014

Section I: Management Discussion

The section explains our mission and describes our organizational structure.

A. USCCR Mission

The U.S. Commission on Civil Rights was created pursuant to the Civil Rights Act of 1957, which was signed into law by President Eisenhower. Since then, Congress has reauthorized or extended the legislation creating the Commission several times; the last reauthorization was in 1994 by the Civil Rights Commission Amendments Act of 1994. Established as an independent, bipartisan, fact-finding federal agency, our mission is to appraise the development of national civil rights policy and enhance enforcement of federal civil rights laws. We pursue this mission by studying alleged deprivations of voting rights and alleged discrimination based on race, color, religion, sex, age, disability, or national origin, or in the administration of justice. We play a vital role in advancing civil rights through objective and comprehensive investigation, research, and analysis on issues of fundamental concern to the federal government and the public.

B. USCCR Organizational Structure

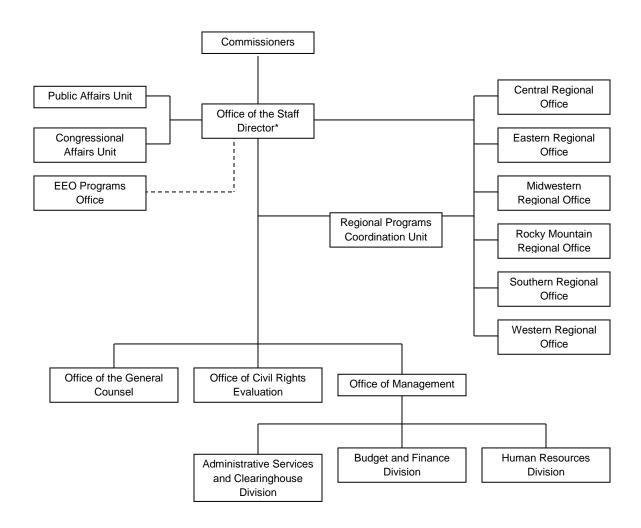
The Commission is an independent federal agency led by eight appointed commissioners. Their responsibilities include establishing agency policy on civil rights issues; adopting program plans, goals, and priorities; approving national office project proposals; and adopting the agency's budget. The staff director, appointed by the President with the concurrence of a majority of the commissioners, is the administrative head of the agency. The organizational chart below shows our current structure.

¹Civil Rights Act of 1957, Pub. L. No. 85-315, § 101, 71 Stat. 634 (1957). See United States Commission on Civil Rights Act of 1983, Pub. L. No. 98-183, 97 Stat. 1301 (1983); United States Commission on Civil Rights Act of 1991, Pub. L. No. 102-167, ____ Stat. ____ (1991).

²Civil Rights Commission Amendments Act of 1994, Pub. L. No. 103-419, 108 Stat. 4338 (1994) (codified at 42 U.S.C.A. § 1975 (2005)).

Organizational Structure

U.S. Commission on Civil Rights



^{*} Although current agency regulations describe an "Office of the Deputy Staff Director," the Commission eliminated that office and the deputy staff director position has been transferred to the Office of the Staff Director.

i. Headquarters Organization

There are eight offices and units in our national office and six regional offices. Of the national offices, two are primarily responsible for civil rights-related research and study—the Office of Civil Rights Evaluation and the Office of the General Counsel. The Inspector General of the U.S. Government Accountability Office (GAO) also holds the

position of Inspector General of the Commission on Civil Rights. Descriptions of the key functions for each office and unit are below.

Office of the Staff Director

The Office of the Staff Director (OSD), through the staff director, oversees the overall operation and management of our agency.

Office of the General Counsel

The Office of the General Counsel (OGC) provides the legal expertise and advice required to support our fact-finding and ensure the legal integrity of our written products.

Office of Civil Rights Evaluation

The Office of Civil Rights Evaluation (OCRE) provides the subject matter and analytical expertise required to prepare social-scientific evaluations of civil rights issues.

Office of Management

The Office of Management (OM) supports all of the agency's strategic goals and objectives by ensuring that human and financial capital are available, and administrative support is in place to achieve the agency's mission.

Congressional Affairs Unit

The Congressional Affairs Unit (CAU) serves as our liaison with Congress.

Public Affairs Unit

The Public Affairs Unit (PAU) serves as the public voice of the Commission and ensures that the public knows about our activities and publications.

Equal Employment Opportunity Programs

The Equal Employment Opportunity (EEO) Programs office is responsible for the overall management of our equal employment opportunity compliance system.

Office of Inspector General

The Consolidated and Further Continuing Appropriations Act of 2012 created the Inspector General of the Commission, and designated that the Inspector General of the U.S. Government Accountability Office (GAO) would hold the position of Inspector

General of the Commission on Civil Rights.³ The Inspector General conducts audits and investigations relating to programs and operations of the Commission.

ii. Regional Programs

Regional Programs Coordination Unit

The chief of the Regional Programs Coordination Unit (RPCU) coordinates the activities of the Commission's six regional offices.

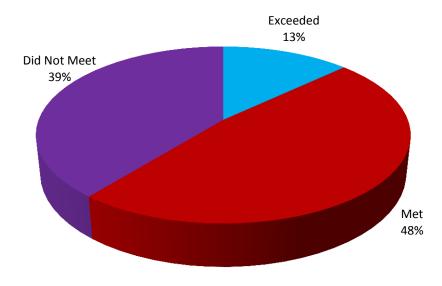
Regional Offices: Organization and State Alignment

The six regional offices provide critical support to the 51 state advisory committees required by our statute. These offices coordinate the Commission's operations in their regions and assist the state advisory committees in their activities.

Section II: Performance Highlights

This section highlights our performance during the fiscal year. We met or exceeded 61 percent of our performance targets. The pie chart represents our overall level of performance for the year.

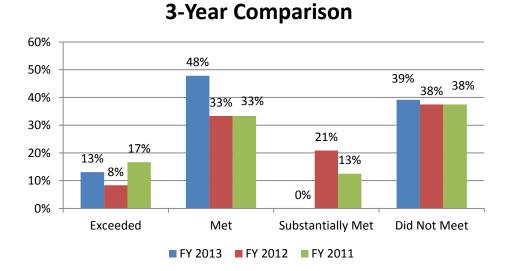
Overall Performance During FY 2013



³ Pub. L. No. 122-55, 125 Stat. 552, 628 (Nov. 18, 2011)

While we faced significant staffing and management constraints, we were able to meet or substantially meet most of our goals. A summary of each strategic goal, its FY 2013 target performance, and our actual performance in Appendix A.

A comparison of agency performance for the last three years is presented in the below bar chart.



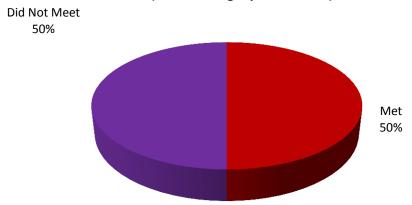
A. Strategic Goal One: Shape a National Conversation on Civil Rights

The Commission's unique position in the civil rights landscape allows it to think and act prospectively and to ask the question: Is the nation's civil rights infrastructure equipped to address the civil rights challenges of the 21st century? During FY 2013, the Commission worked to answer this question and shape a national conversation on current civil rights issues. We sought to accomplish this by:

- seeking to reinvigorate the Commission's state advisory committees (SACs); and
- energizing the Commission's SACs by enhancing their institutional role in program planning and increasing their productivity.

The below pie chart shows how well we executed the activities, strategies, and initiatives we proposed to achieve in our first strategic goal of shaping a national civil rights conversation.

Strategic Goal 1: Shaping a National Conversation on Civil Rights
(actual v. target performance)



Our state advisory committees, with regional office support, published the following five SAC reports in FY 2013:

Advisory Committee	Report Title
Wisconsin	The Somali Community in Barron, WI, and The American
	Dream
	(http://www.usccr.gov/pubs/WI_SomaliReport_2012_Final.pdf)
Ohio	Fair Housing in Ohio
	(http://www.usccr.gov/pubs/OH_FairHousingReport_Final.pdf)
Georgia	School Discipline: African American students
	disproportionately disciplined in Georgia schools as well as
	other school districts in the South
	(http://www.usccr.gov/pubs/GA-SchoolDisciplineReport.pdf)
South Carolina	Equal Educational Opportunity: African American students in
	South Carolina disparately affected by suspensions and
	alternative education placements
	(http://www.usccr.gov/pubs/SC_School-Discipline-Report.pdf)
California	Equal Educational Opportunity and Free Speech on Public
	College and University Campuses in California
	(http://www.usccr.gov/pubs/CA-Free-Speech-Report.pdf)

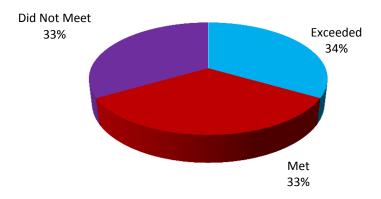
B. Strategic Goal Two: Expand the Capacity of Federal Agencies to Raise Public Awareness of Civil Rights

We continue to work toward expanding the capacity of federal agencies to raise public awareness of civil rights and efficiently and effectively execute their civil rights enforcement responsibilities by engaging in strategic partnerships. We seek to accomplish this by:

- Studying the role and effectiveness of the different federal enforcement agencies and making recommendations as to how those agencies might enhance their effectiveness.
- Studying the effectiveness of current civil rights laws and making recommendations for updates or changes to current law.
- Promoting public awareness of current civil rights laws, remedies, and enforcement agencies.

Because the Commission is not an enforcement agency itself, it is in a unique position to provide leadership and advice on civil rights enforcement within the executive and legislative branches. We are also well-positioned to inform and serve the public by providing opportunities to hear experts and others debate and discuss current and emerging civil rights issues, which is critical to creating a national civil rights conversation. As shown below, we had success in improving this area.

Strategic Goal 2: Expanding the Capacity of Federal Agencies to Raise Public Awareness and Execute Their Enforcement Responsibilities (actual v. target performance)



We exceeded or met 77 percent of our FY 2013 targets.

i. Briefings

To promote public awareness of current civil rights laws, remedies, and enforcement agencies, we held seven briefings.

Federal Civil Rights Engagement with the Arab and Muslim American Communities Post 9/11

The U.S. Commission on Civil Rights held a public briefing on Friday, November 9, 2012 to examine the methods, goals, and effectiveness of the federal government's recent and proposed post-9/11 civil rights engagement with the Arab and Muslim-American community, including federal outreach to the general public to end prejudice and discrimination against these communities.

The Impact of Criminal Background Checks and the EEOC's Conviction Records Policy on the Employment of Black and Hispanic Workers

On December 7, 2012 the U.S. Commission on Civil Rights held a briefing to examine the disparate impact provisions of the Equal Employment Opportunity Commission's (EEOC) April 2012 guidance concerning the use of criminal background histories (2012 Guidance or "new guidance"). The Commission sought to learn about the effects of the EEOC's revised policy on employers and on black and Hispanic applicants with or without a criminal record.

<u>Fiscal Year 2013 Statutory Enforcement Report and Briefing on Sexual Assault in the Military</u>

Recent events demonstrate the timeliness of the Commission's investigation and report: In April 2012, the Pentagon announced new initiatives to combat what Defense Secretary Leon Panetta called a "silent epidemic" of sexual assault in the military. In September 2012, 20 current and former members of the U.S. military filed a lawsuit in federal court in San Francisco alleging that they were sexually assaulted while serving in military units and were harassed, raped, or assaulted in retaliation for reporting the incidents. The lawsuit accuses the leadership of the U.S. Army and U.S. Air Force of failing to prosecute and properly investigate claims of sexual assault. Similar lawsuits were filed earlier this year.

In its investigation, the Commission examined Department of Defense (DoD) policies and practices concerning sexual assault and efforts to reduce and address instances of sexual assault in the Armed Forces. The Commission gathered information on how the DoD:

- (1) educates service members, generally, about the DoD's sexual assault policies;
- (2) educates officers on how to process reports of sexual assault;
- (3) assists sexual assault victims to file reports and receive needed medical/social services;
- (4) investigates sexual assault reports, including the gathering and retention of evidence; and
- (5) disciplines perpetrators, with a special focus on the process by which officers decide what form(s) of discipline to impose.

The Impact of Regulatory, Licensing, and Market Entry Barriers on Emerging Small Businesses

The U.S. Commission on Civil Rights held a briefing on February 8, 2013 to examine the civil rights implications of regulatory, financial, contracting, legal, and other barriers that may impede the progress of new or less-experienced businesses, including both minority-owned businesses that must compete with larger and/or unionized firms, and nonminority businesses that do not qualify for bidding preferences or special federal and state financial assistance reserved for certain minorities.

Reconciling Non-Discrimination Principles with Civil Liberties

The U.S. Commission on Civil Rights held a briefing on March 22, 2013 to examine recent legal developments concerning the intersection of non-discrimination principles with those of civil liberties. The discussion involved U.S. Supreme Court decisions involving both the ministerial exception case, Hosanna-Tabor v. EEOC, and the student group non-discrimination policy case, Christian Legal Society v. Martinez. Also at issue were religious liberty claims under First Amendment provisions other than the Religion Clauses.

Increasing Compliance with Section 7 of the National Voter Registration Act

The U.S. Commission on Civil Rights conducted a briefing on April 19, 2013 to examine efforts to increase compliance with Section 7 of the National Voter Registration Act (NVRA). In 1993, Congress passed the National Voter Registration Act (NVRA) to "increase the number of eligible citizens who register to vote in elections for Federal office" and to "protect the integrity of the electoral process." Section 7 of the NVRA specifically aids this mission by requiring that state-designated public assistance offices and state offices serving persons with disabilities serve as voter registration agencies. The discussion included recent efforts to increase enforcement of NVRA Section 7 requirements. In recent years, litigation undertaken by the Department of Justice and

private persons has settled and as a result, voter registration numbers increased in some states. Other states have pushed back on the federal requirements, however, citing substantial burdens on local public assistance offices.

Protecting the Civil Rights of Our Veterans and Servicemembers

The U.S. Commission on Civil Rights held a public briefing on Friday, May 31, 2013 to hear testimony on whether the Federal Government is adequately protecting the civil rights of our veterans and servicemembers who have fought for our country.

ii. Statutory Report

Sexual Assault in the Military

The U.S. Commission on Civil Rights chose to focus on sexual assault in the U.S. military for its annual 2013 Statutory Enforcement Report. This report examines how the Department of Defense and its Armed Services—the Army, Navy, Marine Corps, and Air Force (the Services)—respond to Service members who report having been sexually assaulted ("victims") and how it investigates and disciplines Service members accused of perpetrating sexual assault ("perpetrators"). This report also reviewed how the military educates Service members and trains military criminal investigators and military lawyers about sexual assault offenses. The topic is both relevant and timely, as Congress is currently considering ways to address this issue. The report is on the Agency's website: http://www.usccr.gov/pubs/09242013 Statutory Enforcement Report Sexual Assault in the Military.pdf

C. Strategic Goal Three: Serve as an Authoritative National Clearinghouse and Repository of Civil Rights Data and Information

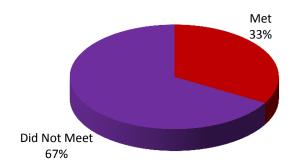
The Commission is charged with keeping the President, Congress, and the public informed of civil rights issues, including discrimination or denial of equal protection of the laws because of race, color, religion, sex, age, disability, or national origin, or in the administration of justice. As such, the Commission is committed to making information on civil rights enforcement and civil rights issues available to the broadest range of stakeholders. We accomplish this goal by:

- strengthening the quality and objectivity of the Commission's reporting;
- collecting and analyzing existing data on disparities among racial and ethnic groups, between the sexes, between the disabled and those who are not disabled, and among other protected classes;
- issuing reports that assess the credibility of claims of systemic or pervasive discrimination and, where discrimination is found to be present, illuminate the

- causes of such discrimination and make recommendations for policy changes to address the problem; and
- conducting original social scientific research that brings new or unique information to the civil rights policy debate.

This year we substantially met 33 percent of our performance targets. Since the GAO recommendation and quality standard performance measures were no longer effective, the Commission discontinued their use at the end of FY 2010.

Strategic Goal 3: Serving as an Authoritative National Clearinghouse and Repository of Civil Rights Data and Information
(actual v. target performance)



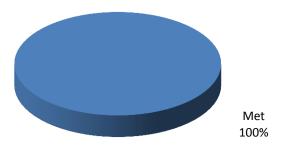
D. Strategic Goal Four: Normalize the Commission's Financial and Operations Controls and Modernize its Information Technology

The Commission is committed not only to serving as the nation's conscience on civil rights matters, but also as a model of management excellence, integrity, efficiency, and accountability. We sought to accomplish this through our strategic goals by:

- adhering to integrated budgeting, planning, and performance management;
- achieving sound financial management, demonstrating financial accountability;
- continuing implementation of adopted GAO and OPM recommendations; and
- modernizing of information technology infrastructure and improving IT management to enhance program efficiency.

Strategic Goal 4: Normalizing the Commission's Financial and Operational Controls, and Modernizing its Information Technology

(actual v. target performance)



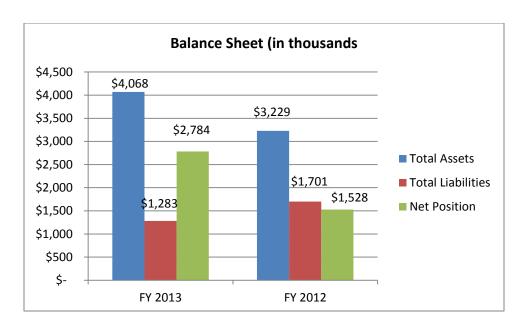
Section III: Financial Highlights

The section provides a summary of our financial position.

The Commission's FY 2013 financial statements were prepared in accordance with Office of Management and Budget (OMB) Circular A-136. The Commission prepares four financial statements: Balance Sheet, Statement of Net Costs, Statement of Changes in Net Position, and Statement of Budgetary Resources.

Balance Sheet

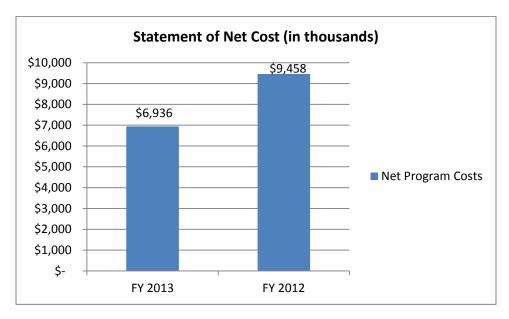
The balance sheet presents amounts of future economic benefits owned or managed by the reporting entity (assets), amounts owed by the entity (liabilities), and amounts which comprise the difference (net position).



The Commission's total assets increased in FY 2013 to \$4,067,705. The Commission's assets consist mainly of Fund Balance with Treasury (FBWT) with minimal amounts in General Property, Plant, and Equipment. Total liabilities decreased from \$1,701,430 in FY 2012 to \$1,283,615 in FY 2013. Net Position increased from \$1,527,984 in FY 2012 to \$2,784,090 in FY 2013.

Statement of Net Costs

The Statement of Net Cost presents the annual cost of operating the Commission's programs.



The Commission's net cost of operation decreased from \$9,458,229 in FY 2012 to \$6,936,325 in FY 2013.

Statement of Changes in Net Position

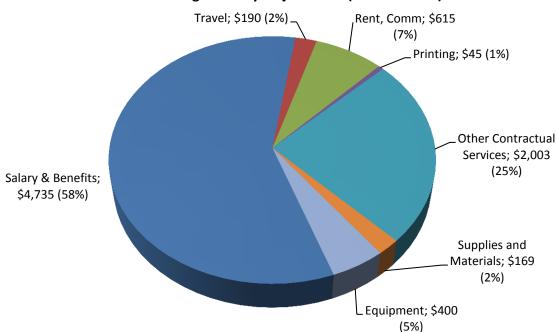
The Statement of Changes in Net Position reports the change in Net Position between FY 2012 and FY 2013. Between the end of FY 2012 and FY 2013, the Commission's Net Position increased from \$1,527,984 to \$2,784,090.

Statement of Budgetary Resources

The Statement of Budgetary Resources provides information on the sources of budgetary resources and their status at the end of the period. The Commission received \$8,324,121 in new budgetary authority in FY 2013. The Total Budgetary Resources and Status of Budget Resources decreased from \$9,534,454 in FY 2012 to \$9,041,963 in FY 2013.

Resources by Major Object Class

During FY 2013, the Commission obligated \$8,157,323 of its appropriation of \$8,324,121 for an obligation rate of 98 percent.



FY 2013 Obligations by Object Class (in thousands)

Salary and Benefits (58 percent), Other Contractual Services (25 percent), and Rent and Communications (7 percent) consume 90 percent of the Commission's resources. The remaining 10 percent consists of travel, printing, supplies, and equipment.

Appendix A: FY 2013 Annual Performance Plan, Targets, and Results

STRATEGIC GOAL 1: Shape a national conversation on current and future civil rights issues that identifies civil rights priorities for policy makers.

Objective	FY 2009 (actual)	FY 2010 (actual)	FY 2011 (actual)	FY 2012 (actual)	FY 2013 (target)	FY 2013 (actual)
Increase the # of SACs re- chartered (1.1.1(a))	65% Chartered	76% Chartered	71% Chartered	45% Chartered	100 % Chartered	100 % Chartered
Eliminate the backlog of un-chartered SACs[1] (1.1.1(b))	56%	76%	91% Chartered	91% Chartered	100% Chartered	100% Chartered
Achieve an average recharter time of 60 days (1.1.1(c))	78 days	204 days	124 Days	117 Days	60 days	140
Obtain input from SACs as a part of national program planning (1.2.2(a))	Once by October 31	Once by October 31	Not Solicited	Not Solicited	Once by October 31	Not Solicited
Solicit SAC ideas for SAC follow-up activities on national office projects (1.2.2(c))	Completed one solicitation	Not Solicited	Not Solicited	Not Solicited	Once annually by October 31	Not Solicited
Conduct a joint national and SAC project every two years and issue a report within 12-18 months (1.2.2(b))	No Joint Report Approved and Issued	Not Approved and Issued	Not Approved and Issued	Not Approved and Issued	Approve and Issue a Joint Report	Not Approved and Issued
Complete multi-state SAC report (1.3)	Report Pending Completion in FY 2010	Completed	N/A	N/A	N/A	N/A
Convene a national civil rights conference (1.4(a))	FY 2009 Civil Rights Conference postponed until FY 2010	Completed	Developed website (photos, transcripts, & video segments)	N/A	N/A	N/A

STRATEGIC GOAL 2: Expand the capacity of federal agencies to raise public awareness of civil rights and efficiently and effectively execute their civil rights enforcement responsibilities by engaging in strategic partnerships.

Objective	FY 2009 (actual)	FY 2010 (actual)	FY 2011 (actual)	FY 2012 (actual)	FY 2013 (target)	FY 2013 (actual)
Produce a report that addresses how civil rights agencies might enhance their effectiveness, including conducting exit or follow-up activities with agencies (2.1.1)	Statutory Report (Mortgage Crisis)	Not Released in FY 2010	Peer-to-Peer Violence and Bullying Examining the Federal Response	Redistricting and the 2010 Census: Enforcing Section 5 of the Voting Rights Act	Once annually (statutory report)	Sexual Assault in the Military
Issue guidance to the executive branch on civil rights enforcement efforts (2.4.4(b))	5 policy and enforcement letters (Baseline Year)	9 policy and enforcement letters	0	0	Issue 3 policy and enforcement letters	0
Participate in at least one inter-agency working group responsible for developing civil rights policy (2.4(d))	N/A	0 inter-agency working group memberships	0 inter-agency working group memberships	N/A	N/A	N/A
Establish congressional contacts and provide substantive input on proposed civil rights legislative agenda items (2.4.4(e))	3	4	1	0	3	0
Host public briefings or hearings annually on civil rights issues (2.5.5(a))	3	6 (including the national conference)	3	3	4	7
Issue press releases related to civil rights issues and Commission activities (2.5.5(c))	21	41	29	12	10	34

(Cont'd)

STRATEGIC GOAL 2: Expand the capacity of federal agencies to raise public awareness of civil rights and efficiently and effectively execute their civil rights enforcement responsibilities by engaging in strategic partnerships.

Objective	FY 2009 (actual)	FY 2010 (actual)	FY 2011 (actual)	FY 2012 (actual)	FY 2013 (target)	FY 2013 (actual)
Post all public meeting and briefing transcripts, and approved reports, on the Web site (2.5.5(d))	14	21	17	15	12	4
Provide assistance to members of the public who seek advice and information about protecting their civil rights by offering a complaint referral service (2.5.5(e))	14-day complaint referral response time	10-day complaint referral response time				
Increase participation in public policy symposia and venues in which the Commission shares its views concerning civil rights policies (2.5.5(f))	0	() N/A	N/A	N/A	N/A

STRATEGIC GOAL 3: Serve as an authoritative national clearinghouse and repository of civil rights data and information.

Objective	FY 2009 (actual)	FY 2010 (actual)	FY 2011 (actual)	FY 2012 (actual)	FY 2013 (target)	FY 2013 (actual)
Written work products meet rigorous standards for accuracy, objectivity, transparency, and accountability (3.1.1.(a))	No reversals of Commission decisions on appeal (Baseline Year)	No reversals of Commission decisions on appeal	N/A	N/A	N/A	N/A
Implement adopted GAO findings and recommendations related to report quality (consistent with any Commissioner-approved timeline) (3.1.1.(b))	100%	N/A	N/A	N/A	N/A	N/A
Issue a report(s) and conduct follow-up research, where necessary, on disparities (3.2.3)	2 briefing reports	3 briefing reports	6 reports	1 reports	2 reports	0 reports
Issue a report(s) and conduct follow-up research, where necessary, assessing the credibility of claims of systemic or pervasive discrimination (3.3.3)	2 briefing reports	3 briefing reports	6 reports	1 reports	2 reports	1 reports
Incorporate original social scientific research into Commission reports (3.4.4)	1 report containing original research data (statutory report)	0	0	0	1 report	0

STRATEGIC GOAL 4: Normalize the Commission's financial and operational controls, and modernize its information technology management and dissemination.

Objective	FY 2009 (actual)	FY 2010 (actual)	FY 2011 (actual)	FY 2012 (actual)	FY 2013 (target)	FY 2013 (actual)
Full compliance with OMB A-11 guidance for integrated budget by FY 2011 (4.1.1(a))	Created annual plans and revised budget(s)	Completed	Completed	Completed	Timely submit budget, create and post agency annual performance plans; budget priorities based on actual appropriations, post congressional budget justification materials on the Agency Web site	Completed
Receive a PART score of at least "moderately effective" by FY 2010 (4.1.1(b))	Updated PART Improvement Plan Data	N/A	N/A	N/A	N/A	N/A
Receive a "clean" or unqualified financial audit (4.2(b))	"Clean Audit"	"Clean Audit"	"Clean Audit"	"Clean Audit"	"Clean Audit"	"Clean Audit"
Full Compliance with laws and regulations respecting stewardship of tax dollars (4.2(b))	Resolved two of three FISMA weaknesses	Resolved one of two FISMA weaknesses; timely completed financial audit	Resolved one of two FISMA weaknesses; timely completed financial audit	Resolved FISMA weaknesses; timely completed financial audit	Resolve identified FISMA weaknesses; timely complete financial audit	Resolved FISMA weaknesses; timely completed financial audit
Conduct an assessment during FY 2008 of the effectiveness and efficiency of the Commission's current administrative structure and develop plan of action in FY 2009 (4.2.2(d))	No assessment conducted	N/A	N/A	N/A	N/A	N/A
Evaluate the agency's organizational structure to support increased effectiveness and efficiency(4.2.2(c))	No assessment conducted	N/A	N/A	N/A	N/A	N/A

(Cont'd)

STRATEGIC GOAL 4: Normalize the Commission's financial and operational controls, and modernize its information technology management and dissemination.

Objective	FY 2009 (actual)	FY 2010 (actual)	FY 2011 (actual)	FY 2012 (actual)	FY 2013 (target)	FY 2013 (actual)
Implement adopted GAO and OPM audit findings and recommendations that address financial and operational procedures (4.3.3)	Implemented adopted GAO and OPM audit findings/recommendations for financial and operational procedures	Completed	N/A	N/A	N/A	N/A