



THE OFFICE OF THE INSPECTOR GENERAL
OF THE INTELLIGENCE COMMUNITY

FISCAL YEAR 2024

ANNUAL WORK PLAN

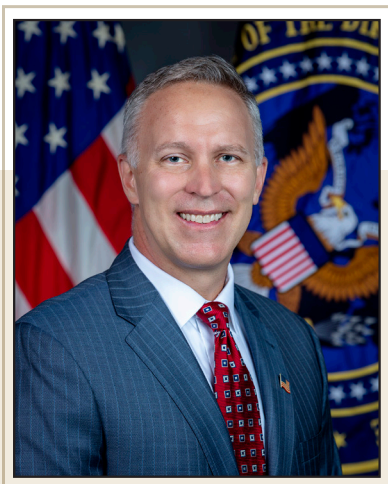
SEPTEMBER 2023

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Inspector General of the Intelligence Community

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FOREWORD

FROM THE INSPECTOR GENERAL

On behalf of the Office of the Inspector General of the Intelligence Community (IC IG), I am pleased to share the IC IG's *Fiscal Year 2024 Annual Work Plan*. This plan includes statutory and discretionary projects and activities that are underway or planned for the next fiscal year. These projects and activities should help the IC IG accomplish our vital mission to promote economy, efficiency, and effectiveness in the administration and implementation of the programs and activities within the Director of National Intelligence's responsibility and authority, and to prevent and detect fraud, waste, and abuse in those programs and activities.

The IC IG considered various sources in developing the *Fiscal Year 2024 Work Plan*, including the *2023 National Intelligence Strategy and ODNI Strategy 2019–2023*, input from the Office of the Director of National Intelligence (ODNI) leadership and workforce, ODNI and Intelligence Community (IC) management challenges and risk areas, completed IC IG work, discussions with Intelligence Community Inspectors General Forum Offices of Inspector General, and items of congressional and U.S. Government Accountability Office interest. IC IG also considered the ability of a project to improve effectiveness and efficiency across ODNI or the IC and the potential for a project to prevent or detect waste, fraud, or abuse within ODNI or the IC.

This annual work plan is comprised of 58 percent mandatory projects and 42 percent discretionary projects. Of note, several discretionary projects in this annual work plan, to include those in the areas of budget, contracts, and hiring, relate to one of the Director of National Intelligence's top priorities of strengthening ODNI as an institution.

Although the annual work plan provides a framework for activities we currently intend to carry out in fiscal year 2024, as in previous years, our actual work may vary depending on changing circumstances and priorities, available resources, emerging issues, additional ODNI and congressional requests, and new requirements in the forthcoming Intelligence Authorization Act, National Defense Authorization Act, or other law.

In addition to the projects articulated in this annual work plan, the IC IG continues conducting and participating in independent and objective investigations of programs and activities within the responsibility and authority of the Director of National Intelligence. Due to the unpredictable and sensitive nature of investigative activities, this plan does not include our investigative work.

Thanks to all those who contributed to our planning process and to the IC IG team for its commitment and ongoing efforts to strengthen the Intelligence Community in service to the Nation.

THOMAS A. MONHEIM

Inspector General of the Intelligence Community

Introduction

Authority

In 2010, Congress amended the National Security Act of 1947 (50 U.S.C. § 3001 et seq.) to establish the Office of the Inspector General of the Intelligence Community (IC IG) within the Office of the Director of National Intelligence. This establishment is codified at 50 U.S.C. § 3033. The IC IG has the statutory authority to independently conduct and issue reports on audits, inspections, investigations, and reviews of programs or activities within the Director of National Intelligence's responsibility and authority. The IC IG is authorized to receive and investigate complaints or information from whistleblowers, and to conduct independent reviews of Intelligence Community matters and whistleblower reprisal claims.

Congress also established the Intelligence Community Inspectors General Forum (the Forum) under 50 U.S.C. § 3033. The IC IG serves as the Chair and Forum members consist of the statutory and administrative Inspectors General with oversight responsibility for an Intelligence Community element. The Forum provides a venue for coordination and collaboration regarding matters of common interest, questions of jurisdiction, and access to personnel and information that may affect more than one Office of the Inspector General.



Statement of Independence

The Inspector General of the Intelligence Community is appointed by the President of the United States, by and with the advice and consent of the Senate. By statute, the Inspector General of the Intelligence Community must be nominated based on integrity, experience, and demonstrated ability, and without regard to political affiliation. Likewise, the Office of the Inspector General of the Intelligence Community (IC IG) must perform its duties with independence, objectivity, and impartiality. Accordingly, the IC IG's findings and conclusions are not influenced by bias or external interference; they are based on the facts and applicable law and in accordance with applicable standards for Offices of Inspector General.

OFFICE OF THE INSPECTOR GENERAL OF THE INTELLIGENCE COMMUNITY

Mission

The Office of the Inspector General of the Intelligence Community's mission is to promote economy, efficiency, and effectiveness and to prevent and detect fraud, waste, and abuse in the programs and activities within the Director of National Intelligence's responsibility and authority.

Vision

A premier workforce that exemplifies core values and strengthens the Intelligence Community and the Nation.



Core Values

Integrity

Do the right thing for the right reasons and the right way.

Independence

Do our jobs impartially without fear or favor.

Transparency

Foster trust and confidence through openness and honesty.

Accountability

Be responsible at every level and in every direction.

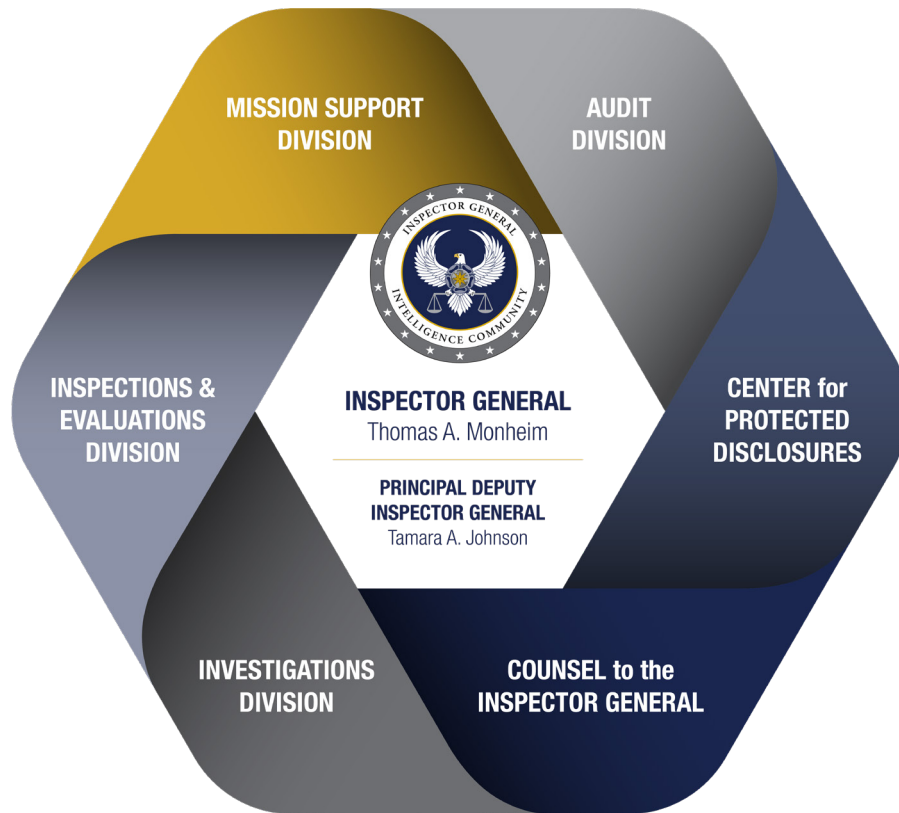
Diversity

Respect and actively leverage the full range of talent on our team.

Organization

The IC IG employs a highly skilled, committed, and diverse workforce, including permanent employees (cadre), employees from other Intelligence Community elements on detail to the IC IG (detailees), and contractors.

The IC IG's senior leadership team comprises the Inspector General, Principal Deputy Inspector General, Counsel to the Inspector General, four Assistant Inspectors General, and the Director of the Center for Protected Disclosures.



IC IG HOTLINE
... Report suspected fraud, waste, and abuse.

855-731-3260 • WWW.DNI.GOV/ICIG



IC IG

FISCAL YEAR 2024 PLANNED PROJECT DESCRIPTIONS

Audit Division



REQUIRED PROJECTS

Audit on the Usage of Artificial Intelligence within the Office of the Director of National Intelligence and the Office of the Director of National Intelligence's Coordination of Artificial Intelligence within the Intelligence Community

This project includes two parts: a research memorandum and a Congressionally Directed Action (CDA) via the Intelligence Authorization Act for Fiscal Year 2023 (division F of Public Law 117–263) (IAA for FY 2023). The objective of the research memorandum is to identify the components within ODNI currently using Artificial Intelligence (AI) and planning to use AI by January 1, 2025, and determine what guidance ODNI has developed and disseminated for AI. The objective for the CDA is to determine if the ODNI has developed an AI program consistent with the IAA for FY 2023 and Intelligence Community (IC) guidance and effectively coordinated and communicated AI information across the IC.

- **2022 IC Management and Performance Challenge(s):** Emerging Technologies

- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Emerging Technologies; Agility and Adaptability

- **2023 National Intelligence Strategy Goal(s):** Position the IC for Intensifying Strategic Competition; Deliver Interoperable and Innovative Solutions at Scale

Audits of Insider Threat Policy Compliance and Effectiveness

These projects include multiple actions: a research memorandum and a CDA via the Classified Annex accompanying the IAA for FY 2023 to conduct audits over multiple IC elements. The objective of the research memorandum is to identify applicable insider threat policies, procedures, and documentation within the applicable IC element. The objectives for the CDA are to determine if IC elements' policy is consistent with the IC standard and the effectiveness of the IC elements' compliance with that standard.

- **2022 IC Management and Performance Challenge(s):** Insider Threat; Cybersecurity Controls

- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Insider Threat; Information Security and Management

- **2023 National Intelligence Strategy Goal(s):** Recruit, Develop, and Retain a Talented and Diverse Workforce that Operates as a United Community; Enhance Resilience

Audit Division



REQUIRED PROJECTS

Fiscal Year 2024 Independent Evaluation of the Office of the Director of National Intelligence's Information Security Program and Practices Required by the Federal Information Security Modernization Act of 2014

Under 44 U.S.C. §§ 3551-3558 (commonly known as the Federal Information Security Modernization Act of 2014 or FISMA), Inspectors General conduct annual assessments and independent evaluations of an agency's information security program and practices. The objective of this evaluation is to assess the effectiveness and maturity of ODNI's information security program and practices during FY 2024, using the FY 2024 Inspector General FISMA Reporting Metrics.

- **2022 IC Management and Performance Challenge(s):** Insider Threat; Cybersecurity Controls; Policies and Procedures
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Insider Threat; Information Security and Management; Policies and Procedures; Resiliency and Readiness
- **2023 National Intelligence Strategy Goal(s):** Deliver Interoperable and Innovative Solutions at Scale; Enhance Resilience

Fiscal Year 2024 Financial Statement Audit of the Office of the Director of National Intelligence

Under 31 U.S.C. § 3515, ODNI must prepare and submit annual audited financial statements to Congress and the Office of Management and Budget (OMB) by November 15 of each year. The financial statement audit ensures the integrity and reliability of the ODNI's financial management and reporting systems. The audit objective is to evaluate the reliability of the data supporting the financial statements, determine the accuracy of the statements produced, and examine the adequacy of footnote disclosures in accordance with guidance issued by the Federal Accounting Standards Advisory Board, OMB, and other authoritative guidance. The audit will also assess internal controls and compliance with laws and regulations related to the objectives and will follow up on the status of findings from the prior year.

- **2022 IC Management and Performance Challenge(s):** Financial Management; Policies and Procedures
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Financial Management; Policies and Procedures
- **2023 National Intelligence Strategy Goal(s):** N/A

Audit Division



REQUIRED PROJECTS

Review of the Office of the Director of National Intelligence's Compliance with the Payment Integrity Information Act of 2019

Under 31 U.S.C. §§ 3351-3358 (commonly known as the Payment Integrity Information Act of 2019 or PIIA), Federal agencies are required to report improper payments. In March 2021, the Office of Management and Budget (OMB) modified OMB Circular A-123, Appendix C, *Requirements for Payment Integrity Improvement*, to transform the payment integrity compliance framework and focus agencies on researching the underlying causes of improper payments, balancing payment integrity risks and controls, and building the capacity to help prevent future improper payments.

Each fiscal year, federal agencies are responsible for meeting the requirements of PIIA. Inspectors General are required to evaluate their agency and publish a report on whether their agency complied with PIIA. This review will evaluate ODNI's compliance with disclosures on improper payments as reported in the *Office of the Director of National Intelligence FY 2023 Agency Financial Report*. The IC IG may modify the scope pending further guidance from OMB.

- **2022 IC Management and Performance Challenge(s):** Financial Management
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Financial Management
- **2023 National Intelligence Strategy Goal(s):** N/A

PEER REVIEW

Generally Accepted Government Auditing Standards (GAGAS) require audit organizations that conduct projects following GAGAS to obtain an external peer review conducted by reviewers independent of the audit organization being reviewed. The peer review provides a basis to determine the design suitability of the reviewed audit organization's system of quality control and compliance with its quality control system. This provides reasonable assurance that the organization conforms to professional standards and applicable legal and regulatory requirements in all material respects.

The IC IG and the Offices of Inspector General (OIGs) at Central Intelligence Agency (CIA), Defense Intelligence Agency (DIA), National Geospatial-Intelligence Agency (NGA), National Reconnaissance Office (NRO), and National Security Agency (NSA) peer review one another's audit divisions once every three fiscal years on a pre-determined schedule. As Chair of the IC Audit Committee, the IC IG Assistant Inspector General for Audit develops the external peer review schedule in coordination with the IC OIGs referenced above. The IC IG Audit Division was peer reviewed in FY 2023 and received a pass rating. The Audit Division's next peer review is scheduled for FY 2026. The IC IG will support an NSA OIG-led external peer review of the NGA OIG Audit Division's system of quality control during the first quarter of FY 2024.

Audit Division



DISCRETIONARY PROJECTS

Resources and circumstances permitting, the Audit Division plans to conduct two discretionary projects:

Research Project of ODNI's Budget Processes

Multiple ODNI senior leaders identified the ODNI budget processes as a challenge during the IC IG's work plan meetings during FY 2023. Specific concerns included a lack of transparency of the budgeting and execution processes and numerous data call requests for budget decisions (i.e., Zero-Based Reviews and personnel decisions) without the supporting data to inform the decision. The objective of this research project is to determine risk areas within ODNI's budgeting processes and identify potential agile audits.¹

- **2022 IC Management and Performance Challenge(s):** Financial Management; Policies and Procedures
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Financial Management; Policies and Procedures; Resiliency and Readiness; Agility and Adaptability
- **2023 National Intelligence Strategy Goal(s):** N/A

Audit of ODNI's Hiring Process

During the IC IG's FY 2023 management challenges stakeholder meetings, numerous ODNI senior leaders voiced concerns about hiring and retention. The objective of this audit is to determine if ODNI hiring processes are effectively and efficiently staffing vacancies within the ODNI. Specifically, whether (1) ODNI is meeting its goals for filling vacancies and onboarding personnel; (2) processes and automation introduced in the information management system are achieving their intended effect; (3) hiring officials are selecting applicants in accordance with applicable law, policy, and standards; and (4) personnel participating in the hiring process are adequately trained.

- **2022 IC Management and Performance Challenge(s):** Human Capital Management; Policies and Procedures
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Human Capital Management; Policies and Procedures; Resiliency and Readiness; Agility and Adaptability
- **2023 National Intelligence Strategy Goal(s):** Recruit, Develop, and Retain a Talented and Diverse Workforce that Operates as a United Community

¹ Agile audits are usually narrowly targeted in scope and seek to highlight issue areas in real time that require immediate action to resolve.

Inspections and Evaluations Division



REQUIRED PROJECTS

Capstone of Independent Department of Defense Office of Inspector General and National Security Agency Office of Inspector General Reviews of the Relationship between the National Security Agency and the United States Cyber Command

In an April 11, 2022, letter, the House Permanent Select Committee on Intelligence and the Senate Select Committee on Intelligence requested that the IC IG, DoD OIG, and NSA OIG conduct a joint, in-depth, comprehensive review of the relationship between NSA and USCYBERCOM. The DoD OIG announced its evaluation of USCYBERCOM on January 23, 2023, and the NSA OIG announced its evaluation of NSA on January 25, 2023. These evaluations will be conducted separately, but will be synchronized to the extent possible. Upon completion of the DoD OIG and NSA OIG reports, the IC IG, in coordination with DoD OIG and NSA OIG, will compare, contrast, and aggregate the reports' findings and will produce a capstone report.

- **2022 IC Management and Performance Challenge(s):** Information Sharing and Mission Integration within the IC
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** N/A
- **2023 National Intelligence Strategy Goal(s):** N/A

Classification Review of ODNI, Fiscal Year 2024

Pursuant to Section 6721(a) of the Damon Paul Nelson and Matthew Young Pollard Intelligence Authorization Act for Fiscal Years 2018, 2019, and 2020 (division E of Public Law 116-92), the IC IG is required to assess ODNI's classification and declassification processes. In accordance with the Act, the IC IG evaluates ODNI's accuracy in applying classification and handling markers in finished reports; compliance with declassification procedures; and effectiveness in identifying topics of public or historical importance that should be prioritized for declassification review. Section 6811(f) of the Intelligence Authorization Act for Fiscal Year 2023 (division F of Public Law 117-263) amended the periodicity of the required classification review. Consistent with this revision, the IC IG will submit a report in FY 2024 and then a final report during the FY 2025 to FY 2026 period.

- **2022 IC Management and Performance Challenge(s):** Policies and Procedures
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Policies and Procedures
- **2023 National Intelligence Strategy Goal(s):** N/A

Inspections and Evaluations Division



REQUIRED PROJECTS

PEER REVIEW

The *Guide for Conducting External Peer Reviews of Inspection and Evaluation Organizations of Federal Offices of Inspector General* provides assurance to OIGs and their stakeholders of the inspections and evaluations organization's compliance with the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Quality Standards for Inspection and Evaluation (Blue Book) standards. An OIG's inspections and evaluations organization is externally peer reviewed every three years to assess whether reports complied with the Blue Book standards and the organization's associated internal policies and procedures. External peer reviews provide a level of objectivity and independence in making this determination.

In FY 2023, the IC IG Inspections and Evaluations (I&E) Division supported OIG peer reviews of organizational work performed in accordance with the Blue Book standards for the National Security Agency and the National Reconnaissance Office OIGs. In addition, the IC IG I&E Division will support the external peer review of CIA OIG in FY 2024.

As Chair of the IC IG's Inspections Committee, the IC IG Assistant Inspector General for Inspections and Evaluations will serve as the peer review coordinator for the IC OIGs' inspection and evaluations programs and provide updates to the CIGIE Inspections and Evaluations Committee as needed.

Inspections and Evaluations Division



DISCRETIONARY PROJECTS²

Resources and circumstances permitting, the I&E Division plans to conduct one or more of the following projects:

Joint IC IG and DOE OIG Evaluation of DOE Security Processes

A joint evaluation team of IC IG I&E staff and Department of Energy (DOE) OIG Inspections staff will evaluate the effectiveness of personnel security processes in accordance with the requirements in Security Executive Agent Directives and Department of Energy Orders.

- **2022 IC Management and Performance Challenge(s):** Insider Threat; Personnel Security Clearance and Reciprocity Processes
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Insider Threat
- **2023 National Intelligence Strategy Goal(s):** Enhance Resilience; Recruit, Develop, and Retain a Talented and Diverse Workforce that Operates as a United Community; Position the IC for Intensifying Strategic Competition

ODNI Quick Reviews

The IC IG I&E Division will conduct a series of quick reviews of ODNI components. The goals are to provide ODNI management with a snapshot of the general health and welfare of the component, to improve overall performance through on-site assistance and recommendations, and to develop trends to identify systemic issues. Quick reviews may assess mission, functions, operational tempo, and performance management; operational successes, issues and impediments; communication, collaboration, and integration; accountability and internal controls; and IG special interest items.

- **2022 IC Management and Performance Challenge(s):** Financial Management
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** Financial Management; Resiliency and Readiness
- **2023 National Intelligence Strategy Goal(s):** Deliver Interoperable and Innovative Solutions at Scale

² The list of discretionary projects is not necessarily in order of priority nor intended sequence.

Investigations Division



REQUIRED PROJECTS

PEER REVIEW

CIGIE established a Qualitative Assessment Review program for Investigative Operations of Federal Offices of Inspector General to ensure that CIGIE Quality Standards for Investigations and Digital Forensics are followed and that law enforcement powers are properly exercised.

In March and June 2021, IC IG's Assistant Inspector General for Investigations, as the Chair of the Forum's Investigations Committee, and in collaboration with Committee members, implemented a team approach concept for conducting external quality assurance (peer) reviews. These reviews are performed consistent with CIGIE Quality Standards for Investigations. This approach allows for an investigator from each IC OIG to participate in the scheduled reviews. A senior investigator leads each review. Less experienced investigators are also given the opportunity to participate, which advances professional growth and development.

The IC IG will begin its planning for the review of the CIA in FY 2024. IC IG will continue to coordinate and support the reviews of the IC elements while preparing for its review in FY 2024.

The Assistant Inspector General for Investigations, as the Forum's Investigations Committee Chair, serves as the peer review coordinator for reviews of IC OIG investigations programs. The Assistant Inspector General for Investigations also provides updates to the CIGIE Investigations Committee as needed or required.

Counsel to the Inspector General



DISCRETIONARY PROJECTS

Report Concerning the Independence of Intelligence Community Offices of Inspector General









The IG staff from the Senate Select Committee on Intelligence (SSCI) has solicited input from the Counsel Team on how to best ensure the independence of IC OIGs. Counsel Team has coordinated this request with the Forum Counsels Committee and is in ongoing discussions with SSCI staff related to this request. In lieu of a more specific formal request from SSCI, the Counsel Team will produce a report that summarizes voluntarily provided input from IC OIGs regarding actual and potential impairments to IC OIG independence, dependencies on agency element services which may potentially affect independence, and best practices that have improved the independence of IC OIGs in the last few years. This report will be written in coordination with the IC OIGs through the Counsels Committee.

- **2022 IC Management and Performance Challenge(s):** N/A
- **2023 ODNI Management and Performance Challenge(s) or Risk Area(s):** N/A
- **2023 National Intelligence Strategy Goal(s):** N/A

APPENDIX A: The Audit Process

The Office of the Inspector General of the Intelligence Community (IC IG) Audit Division assesses whether the goals and objectives of the Office of the Director of National Intelligence and Intelligence Community element programs are achieved; resources are used efficiently, and the programs and activities are conducted in accordance with applicable laws, regulations, and good business practices. Audits and projects may be financial or performance in nature.

The audit process consists of the following stages:

1		Announcement Memorandum	IC IG auditors communicate the intent to start an audit by issuing an announcement memorandum, which includes an overview of the planned objectives for the audit.
2		Entrance Conference	This meeting provides agency stakeholders an opportunity to discuss the topic under review and the IC IG's planned scope and methodology.
3		Planning	IC IG auditors gain an understanding of the program and plan work to answer the announced objectives.
4		Fieldwork Phase	IC IG auditors perform the analysis necessary to address the audit's objectives. This phase includes collecting and assessing agency documents and conducting interviews.
5		Exit Conference	The IC IG auditors brief agency stakeholders on the IC IG's results and conclusions.
6		Draft Report for Comment	IC IG auditors provide the draft report to agency stakeholders for their official written response to the audit.
7		Final Report Issuance	After IC IG auditors receive the agency's official response of report findings and recommendations, the auditors finalize the report and deliver it to the agency.
8		Recommendation Follow-Up	After issuing the report, IC IG auditors assess the status of the organization's implementation recommendations. Recommendations are closed once the agency has completed actions to resolve the issues reported.

APPENDIX B: The Inspections and Evaluations Process

The Office of the Inspector General of the Intelligence Community (IC IG) Inspections and Evaluations (I&E) Division's mission is to conduct inspections, evaluations, and reviews of the programs and activities within the Director of National Intelligence's responsibility and authority. The Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspections and Evaluations gives the I&E Division the flexibility to develop tailored approaches for conducting systematic and independent inspections and evaluations of Office of the Director of National Intelligence components and Intelligence Community elements. Using a multidisciplinary staff and various methods for gathering and analyzing data, inspections and evaluations typically analyze information; measure performance; determine compliance with applicable law, regulation, and/or policy; identify potential savings; share best practices or promising approaches; and assess allegations of fraud, waste, abuse, and mismanagement.

The inspections and evaluations process consists of the following stages:



APPENDIX C: The Investigations Process

The Office of the Inspector General of the Intelligence Community (IC IG) Investigations Division conducts or participates in independent and objective criminal and administrative investigations pertaining to programs and activities within the Director of National Intelligence's responsibility and authority. Consistent with the IC IG's unique statutory authority, the Investigations Division coordinates cross-Intelligence Community (IC) criminal and administrative investigations. The Investigations Division fulfills the IC IG's statutory obligations by conducting investigations that detect and deter fraud and abuse in such programs and activities. In addition, investigations can provide senior managers with actionable information on critical issues that aid their decision-making.

Although investigations may be proactive, based on planned initiatives using data analytics, many investigations are reactive and initiated in response to information and allegations the Investigations Division receives. Due to the combination of unpredictability and the need to protect sources and methods of proactive investigations, the Investigations Division does not identify its planned investigations in the *Fiscal Year 2024 Annual Work Plan*. However, because investigations often result from a deliberate subversion of the Office of the Director of National Intelligence (ODNI) procedures or controls, the details obtained from investigations may result in referrals to other IC IG divisions and become integral to planning audits, inspections, and special projects.

The Investigations Division receives information about potential violations through various sources, including the IC IG's Hotline, in-person meetings, telephone calls, emails, referrals from Intelligence Community Inspectors General Forum (the Forum) members, and law enforcement agencies. Examples of the types of violations the Investigations Division handles include, but are not limited to:

- conflicts of interest;
- bribes and kickbacks;
- unauthorized disclosures;
- procurement fraud;

- cost mischarging;
- false official statements;
- abuse of authority by government officials;
- reprisal and retaliation;
- misuse of government resources; and
- senior official misconduct.

The IC IG uses its independent investigative authority to gather and analyze facts associated with the information it receives to determine if potential violations have occurred and the extent or severity of those potential violations. Cases in which violations are determined to be relatively minor are often referred to ODNI management for administrative action. The Investigations Division also refers complaints involving other agencies to the appropriate Inspector General office for further handling, if warranted. However, cases where violations are determined to be more serious (e.g., involving allegations of significant loss or serious violations of law) are further investigated for possible criminal prosecution and/or civil litigation. When the IC IG's Investigations Division substantiates the allegations, one or more of the following actions, depending on the type and severity of the violation, may occur:

- criminal and/or military prosecution;
- payment of restitution and/or civil settlement;
- removal of personnel;
- management referral;
- contract value adjustment; and
- contract administrative action.

The Investigations Division engages in extensive outreach to help ensure that ODNI personnel are fully aware of current and emerging issues as well as their obligation to report potential violations. For example, it regularly briefs new employees to raise employee awareness. The Investigations Division also provides alerts on schemes and incidents that adversely affect the ODNI and IC programs. The Division regularly liaises with Forum members and law enforcement agencies to share information, generate potential investigative leads, and cultivate sources.

APPENDIX D: The Center for Protected Disclosures

The Office of the Inspector General of the Intelligence Community (IC IG) Center for Protected Disclosures (the Center) processes disclosures and complaints reported by whistleblowers and provides guidance to individuals about the options and protections afforded to individuals who may wish to make protected disclosures to the IC IG and/or Congress, or who believe they suffered reprisal because they made a protected disclosure.

The Center performs four critical functions for whistleblowers in the IC.

First, the Center, through the IC IG Hotline program, receives and processes whistleblower complaints of fraud, waste, abuse, or mismanagement of programs and activities within the responsibility of the Director of National Intelligence (DNI). There are six ways complainants can report their concerns to the IC IG Hotline: (1) public and secure telephone numbers; (2) public and secure websites; (3) walk-in meetings at the IC IG's offices; (4) U.S. Postal Service mail; (5) fax; and (6) drop boxes located in Office of the Director of National Intelligence facilities.

Second, the Center, through the IC IG Hotline program, receives and processes allegations of “urgent concerns” pursuant to 50 U.S.C. § 3033(k)(5) (commonly known as the Intelligence Community Whistleblower Protection Act or ICWPA). The ICWPA establishes a process to ensure that the DNI and congressional intelligence committees receive disclosures regarding certain types of wrongdoing, including serious or flagrant problems, abuses, violations of law or executive order, or deficiencies relating to the funding, administration, or operation of an intelligence activity.

In order to submit an “urgent concern” to the IC IG, the law requires that a submitter be “[a]n employee of an element of the intelligence community, an employee assigned or detailed to an element of the intelligence community, or an employee of a contractor to the intelligence community.” The ICWPA also requires that a submitter provide a complaint or information with respect to an “urgent concern,” which is defined as one of the following:

A serious or flagrant problem, abuse, violation of the law or Executive order, or deficiency relating to the funding, administration, or operation of an intelligence activity of the Federal Government that is a matter of national security; and not a difference of opinion concerning public policy matters.

A false statement to Congress, or a willful withholding from Congress, on an issue of material fact relating to the funding, administration, or operation of an intelligence activity.

An action, including a personnel action described in section 2302(a)(2)(A) of title 5, United States Code, constituting reprisal or threat of reprisal prohibited under subsection (g)(3)(B) of this section in response to an employee's reporting an urgent concern in accordance with this paragraph.

Whistleblowing Defined

Whistleblowing is the lawful disclosure to an authorized recipient of information a person reasonably believes evidences wrongdoing. It is the mechanism to relay the right information to the right people to counter wrongdoing and promote the proper, effective, and efficient performance of the Intelligence Community (IC) mission. Whistleblowing in the IC is extremely important, as it ensures that personnel can “say something” when they “see something” through formal reporting procedures without harming national security and without retaliation.



APPENDIX D: The Center for Protected Disclosures, *continued*

If the IC IG determines that the complaint falls within the definition of the ICWPA, then the IC IG must, within 14 calendar days, determine whether the “urgent concern” allegation “appear[s] credible.” The Center tracks all ICWPA disclosures, ensures review of materials for classified information, and coordinates disclosures with other Offices of Inspector General (OIGs) for appropriate review and disposition.

Third, the Center adjudicates requests by IC employees and contractors for the IC IG to review their allegations of reprisal under Presidential Policy Directive 19, *Protecting Whistleblowers with Access to Classified Information*, and 50 U.S.C. §§ 3234, 3236, and 3341(j). These authorities prohibit acts of reprisal against employees and contractors serving in the IC, as well as those who are eligible for access to classified information, who make protected disclosures.

The Center also reviews other IC OIGs’ determinations regarding whistleblower reprisal allegations and non-IC OIGs’ determinations regarding security clearances alleged to be in reprisal for making a protected disclosure. A whistleblower who has exhausted his or her home agency’s whistleblower protection processes may request an External Review Panel (ERP). Under appropriate circumstances, the IC IG may convene an ERP and review the matter.

Fourth, the Center conducts outreach across the community. The Center provides guidance to personnel seeking more information about the options and protections afforded to individuals who may wish to make a protected disclosure to the IC IG and/or Congress, or who believe they have suffered reprisal because they made a protected disclosure. The IC IG conducts community outreach and training activities to ensure stakeholders have accurate and consistent whistleblowing information relating to these and other matters.

APPENDIX E: Counsel to the Inspector General

The Counsel to the Inspector General ensures that the Inspector General and other members of the Office of the Inspector General of the Intelligence Community (IC IG) receive independent, confidential legal advice and policy counsel.

The Counsel Team’s legal support and guidance meets the unique needs of each IC IG division.

INVESTIGATIONS

To support the Investigations Division, the Counsel Team, among other things, highlights and provides advice on potential legal issues that may require additional or redirected investigative efforts throughout the investigative process.

AUDIT & INSPECTIONS AND EVALUATIONS

To support the activities of the Audit Division and Inspections and Evaluations Division, the Counsel Team identifies and interprets key policy, contract, and legal provisions relevant to reported observations, findings, and recommendations.

CENTER FOR PROTECTED DISCLOSURES

In support of IC IG’s whistleblower program, the Counsel Team assists the Center for Protected Disclosures in developing policies and procedures, evaluating whistleblower disclosures, and providing legal advice for external review panels.

ENTERPRISE-WIDE SUPPORT

The Counsel Team also provides enterprise-wide legal and policy guidance and reviews matters related to IC IG personnel, administration, training, ethics, independence, and budgetary functions.

PARTNERSHIPS

Attorneys from the Counsel Team also participate in the Intelligence Community Inspectors General Forum, the Forum’s Counsels Committee, the Council of the Inspectors General on Integrity and Efficiency’s Legislative and Counsels Committees, and working groups of the Five Eyes Intelligence Oversight and Review Council.

In addition to its legal support role, the Counsel to the Inspector General serves as the IC IG’s congressional liaison.

APPENDIX F: Intelligence Community Inspectors General Forum

One of the most significant ways the Inspector General of the Intelligence Community (IC IG) works to improve integration of the Intelligence Community (IC) is through the Intelligence Community Inspectors General Forum (the Forum). Pursuant to 50 U.S.C. § 3033(h)(2), the Forum consists of statutory or administrative Inspectors General with oversight responsibility for an element of the IC. The IC IG is the Chair of the Forum.

Through the Forum, members can learn about the work of individual members that may be of common interest and discuss matters related to jurisdiction or access to information and staff. As Chair, the IC IG leads the Forum by coordinating efforts to find joint solutions to mutual challenges for improved integration among the Forum members. Forum committees, topic-specific working groups, and subject matter experts generate ideas to address shared concerns and mutual challenges for consideration and decision by the Inspectors General.



Office of the Inspector General of the
Intelligence Community



Central Intelligence Agency
Office of Inspector General



Defense Intelligence Agency
Office of the Inspector General



Department of Defense
Office of Inspector General



Department of Energy
Office of Inspector General



Department of Homeland Security
Office of Inspector General



Department of Justice
Office of the Inspector General



Department of State
Office of Inspector General



Department of the Treasury
Office of Inspector General



National Geospatial-Intelligence Agency
Office of the Inspector General



National Reconnaissance Office
Office of Inspector General



National Security Agency
Office of the Inspector General

APPENDIX G: ACRONYM LIST

AI	Artificial Intelligence
The Center	Center for Protected Disclosures
CIA	Central Intelligence Agency
CIGIE	Council of the Inspectors General on Integrity and Efficiency
DIA	Defense Intelligence Agency
DNI	Director of National Intelligence
DoD	Department of Defense
DOE	Department of Energy
ERP	External Review Panel
FISMA	Federal Information Security Modernization Act of 2014
The Forum	Intelligence Community Inspectors General Forum
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
I&E	Inspections and Evaluations
IAA	Intelligence Authorization Act
IC	Intelligence Community
IC IG	Inspector General of the Intelligence Community
ICWPA	Intelligence Community Whistleblower Protection Act
NGA	National Geospatial-Intelligence Agency
NRO	National Reconnaissance Office
NSA	National Security Agency
ODNI	Office of the Director of National Intelligence
OIG	Office of Inspector General
OMB	Office of Management and Budget
PIIA	Payment Integrity Information Act of 2019
U.S.C.	United States Code

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