OFFICE OF THE INSPECTOR GENERAL OF THE INTELLIGENCE COMMUNITY

Annual Work Plan

Fiscal Year 2022

Tamara A. Johnson

Acting Inspector General of the Intelligence Community
I am pleased to share the Fiscal Year (FY) 2022 Annual Work Plan on behalf of the Office of the Inspector General of the Intelligence Community (IC IG). The plan summarizes congressionally mandated projects that align with the IC IG’s statutory requirements and discretionary activities currently underway or planned for the next fiscal year. The projects included in the plan correlate with the IC IG’s mission to promote economy, efficiency, and effectiveness in the administration and implementation of the programs and activities within the Director of National Intelligence’s (DNI’s) responsibility and authority.

The IC IG considered a number of information sources in developing the FY 2022 Work Plan, including the 2019 National Intelligence Strategy, the ODNI Strategic Plan (2019 – 2023), previously recognized management challenges, prior IC IG work, and items of congressional interest. Members of the IC IG leadership team met with Intelligence Community (IC) principals to identify challenges encountered when completing mission-essential duties; discussed programs that might benefit from assessments of effectiveness and efficiency; and evaluated risks for potential fraud, waste, and abuse. We also solicited input from the workforce through an Office of the Director of National Intelligence (ODNI) write-in campaign to ensure we captured the perspectives of the men and women of the IC. These efforts, coupled with other IC element discussions, helped inform project selection.

In addition to the projects captured in the Work Plan, the IC IG will continue to conduct or participate in independent and objective criminal and administrative investigations of programs and activities within the DNI’s responsibility and authority. Due to the unpredictable nature of investigative activities and the need to protect sources and methods, this plan does not capture our investigative work.

The IC IG continues to face challenges associated with COVID-19 and limited personnel resources. We intend to complete the projects identified in the Annual Work Plan; however, the need to protect the health and safety of our employees or other unforeseen workforce constraints may alter the timeframes outlined in the plan. Additionally, potential directives issued by Congress with the enactment of the Intelligence Authorization Act and the National Defense Authorization Act could require the IC IG to adjust the Work Plan and impact our ability to execute some discretionary projects.

I wish to thank everyone who contributed to our planning process. I would also like to thank my staff for its unwavering commitment to the mission. The IC IG remains steadfast in its dedication to providing independent and effective oversight of the Intelligence Community. We look forward to working with the ODNI, the Intelligence Community, and Congress to improve the IC, keep the homeland safe, and strengthen the Nation.

Tamara A. Johnson
Acting Inspector General of the Intelligence Community
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INTRODUCTION

AUTHORITY

The Intelligence Authorization Act for Fiscal Year 2010 (IAA), codified at Title 50, United States Code, Section 3033, established the Office of the Inspector General of the Intelligence Community (IC IG) within the Office of the Director of National Intelligence (ODNI). 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 (DNI’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 (IC) whistleblower reprisal claims.

The IAA also established the IC Inspectors General Forum (the Forum). The Inspector General of the IC serves as the Chair, and Forum members consist of the statutory and administrative Inspectors General with oversight responsibility for an IC 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, with the advice and consent of the United States Senate. By statute, the Inspector General of the IC must be nominated based on integrity, experience, and demonstrated ability, and without regard to political affiliation. Likewise, the 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.
MISSION

The IC IG’s mission is to promote economy, efficiency, and effectiveness in the administration and implementation of the programs and activities within the DNI’s responsibility and authority, and to prevent and detect fraud, waste, and abuse in those programs and activities. We also lead and coordinate the efforts of the Intelligence Community Inspectors General Forum.

VISION

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

IC IG CORE VALUES

INTEGRITY
INDEPENDENCE
TRANSPARENCY
ACCOUNTABILITY
DIVERSITY
ORGANIZATION

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

The IC IG’s leadership team includes the Inspector General (IG), Principal Deputy IG, Counsel to the IG, four Assistant Inspectors General, and one Center Director.

It’s always the right time
to do the right thing

Report suspected fraud, waste, and abuse

ICIG HOTLINE

Open: 855-731-3260 • www.dni.gov/ICIG
FISCAL YEAR 2022 PLANNED PROJECT DESCRIPTIONS

I. AUDIT

REQUIRED PROJECTS

Fiscal Year 2021 Risk Assessment of the Office of the Director of National Intelligence’s Government Charge Card Program

The Government Charge Card Abuse Prevention Act of 2012 requires inspectors general to conduct periodic risk assessments of agency charge card programs to analyze the risk of illegal, improper, or erroneous purchases. The assessment will examine ODNI’s Fiscal Year (FY) 2021 Charge Card Program to identify and assess the risk of illegal, improper, or erroneous purchases and payments.


The Federal Information Security Modernization Act of 2014 (FISMA) prescribes an annual process of self-assessment and independent evaluation 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 2022, using the Fiscal Year 2022 Inspector General Federal Information Security Modernization Act of 2014 (FISMA) Reporting Metrics.

Fiscal Year 2021 Financial Statement Audit of the Office of the Director of National Intelligence

Title 31, United States Code, Section 3515, as amended by the Accountability of Tax Dollars Act of 2002, requires the ODNI to 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.

The IC IG will review the Defense Intelligence Agency, Office of Inspector General’s level of independence and effectiveness.

DISCRETIONARY PROJECTS

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

Audit of the Security for the Office of the Director of National Intelligence’s Remote Access Capabilities

In response to the COVID-19 pandemic, ODNI encouraged the workforce to maximize flexible work schedules, to include the use of telework, when appropriate. ODNI implemented an unclassified system that provided employees a mechanism to work remotely and connect to ODNI workspaces. The IC IG will determine whether ODNI implemented effective security and monitoring controls to provide employees remote access to unclassified information and information systems.

Audit of the Office of the Director of National Intelligence’s Human Resource Management Hiring Processes

The Audit Division will determine whether ODNI hiring processes are effective and efficient in accordance with applicable federal laws and ODNI regulations, procedures, and practices. The review will assess the readiness, capacity and ability of the Human Resource Management workforce to effectively implement policies and procedures and identify any challenges that affect ODNI’s ability to hire qualified individuals.

Audit of the Office of the Director of National Intelligence’s Oversight of Service Agreements

The IC IG will conduct an audit of the service agreements between ODNI and other IC elements to determine whether ODNI is performing the oversight necessary to ensure it receives the services for which it paid.

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1 (U) The list of discretionary projects is not necessarily in order of priority nor intended sequence.
II. INSPECTIONS AND EVALUATIONS

REQUIRED PROJECTS

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

The Payment Integrity Information Act of 2019 (PIIA), which repealed The Improper Payments Elimination and Recovery Act (IPERA), sets forth reporting requirements for improper payments. In March 2021, the Office of Management and Budget (OMB) modified Appendix C to OMB Circular A-123 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 FY 2021 Agency Financial Report. The IC IG may modify the scope pending further guidance from OMB.


The National Defense Authorization Act for Fiscal Year 2020 requires the IC IG to assess ODNI’s security classification and declassification processes. In accordance with the Act, the IC IG will evaluate 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. Starting in FY 2021, the IC IG will complete this evaluation once each year for three consecutive years.

Title 5 U.S. Code Section 11001 – Enhanced Personnel Security Program

5 U.S.C. § 11001 requires the Director of National Intelligence to “direct each agency to implement a program to provide enhanced security review of covered individuals” no later than the earlier of five years from the date of enactment of the Intelligence Authorization Act of 2016 or when the backlog of overdue periodic reinvestigations of covered individuals is eliminated. In accordance with 5 U.S.C. § 11001(d), the IC IG will assess the effectiveness of the continuous evaluation program for ODNI employees based on the metrics and guidelines as published by the Director of National Intelligence.
DISCRETIONARY PROJECTS

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

Assessment of the Intelligence Community’s Compliance with Analytic Tradecraft Standards

The IC IG will evaluate the IC’s effectiveness in ensuring compliance with analytic tradecraft standards. The I&E Division will also determine the extent to which existing oversight structures are effective in safeguarding IC analytic products.

Evaluation of the Office of the Director of National Intelligence’s Rotational Assignment Programs and Interagency Staffing Agreements

The I&E Division will evaluate the ODNI’s strategies and programs to recruit and hire staff for positions that are in high demand or difficult to fill through the use of the Intelligence Community Joint Duty Program and interagency agreements. The review will assess the effectiveness of interagency and internal rotational agreements, use of memorandums of understanding, and similar staffing strategies.

Review of Intelligence Community Domestic Intelligence Integration

The IC IG will evaluate domestic intelligence integration across the IC. The review will assess ODNI’s efforts to ensure the delivery of timely, objective, accurate, and relevant domestic intelligence in support of IC mission objectives.

Reviews of Component Activities

The I&E Division will conduct a series of select abbreviated reviews of ODNI component activities and functions. The reviews will focus on identifying systemic issues, address emerging trends, and improving overall performance.

Review of the Intelligence Community’s Diversity and Inclusion Initiatives (Carry-over from FY 2021)

The I&E Division will evaluate the IC’s diversity and inclusion programs. The evaluation will assess ODNI’s management of diversity and inclusion efforts across the IC as an integrated entity.

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2 The list of discretionary projects is not necessarily in order of priority or intended sequence.
Evaluation of the Intelligence Community Services of Common Concern (Carry-over from FY 2021)

The I&E Division will evaluate ODNI’s oversight and management of Services of Common Concern (SoCC). The evaluation will assess the effectiveness and efficiency of SoCC governance, funding, and the adequacy of services provided.
III. COUNSEL

REQUIRED PROJECTS FOR THE INTELLIGENCE COMMUNITY INSPECTORS GENERAL FORUM

Oversight by the Inspector General of the Intelligence Community over Intelligence Community Whistleblower Matters

The Intelligence Authorization Act for Fiscal Year 2018, 2019, and 2020 requires the IC IG, in consultation with the Forum, to establish a system and develop related policies whereby the IC IG is notified in near real time of (1) the submission of complaints by whistleblowers to IGs of the elements of the IC relating to the programs and activities under the jurisdiction of the DNI, and information related to such complaints; and (2) actions taken by an IG of an IC element related to such actions.

Role of Inspectors General in Investigating Unauthorized Disclosures

The Joint Explanatory Statement accompanying The Intelligence Authorization Act of Fiscal Years 2018, 2019, and 2020 directs the IC IG to submit a report regarding the role of IGs in the investigation of unauthorized disclosures within the IC. The requirement directs the IC IG to address (1) the roles of IC elements’ security personnel and law enforcement regarding unauthorized disclosures; (2) the current role of IGs within the IC elements regarding such disclosures; (3) what, if any, specific actions could be taken by such IGs to increase their involvement in the investigation of such matters; (4) any laws, rules or procedures that currently prevent IGs from increasing their involvement; and (5) the benefits and drawbacks of increased IG involvement, to include potential impacts to the IG’s roles and missions.

REQUIRED PROJECTS DIRECTING THE IC IG TO PROVIDE SUPPORT TO THE DNI

Report on Cleared Whistleblower Attorneys

The Intelligence Authorization Act for Fiscal Years 2018, 2019, and 2020 requires the DNI, in coordination with the IC IG and the Forum, to submit a report on access to cleared attorneys by IC whistleblowers. The statute prescribes that the report shall include (1) the number of whistleblowers in the IC who requested, through formal or verbal request, to retain an attorney;
(2) the number of such limited security agreements approved, rejected, or pending; (3) the scope and clearance levels of such limited security agreements; (4) the number of such whistleblowers represented by cleared counsel; and (5) recommendations for legislative or administrative action to ensure that whistleblowers in the IC have access to cleared attorneys. Pursuant to the statute, the IC IG will support, as appropriate, the DNI’s efforts in furtherance of this review.

Report on Protections for Confidentiality of Whistleblower-related Communications

*The Intelligence Authorization Act for Fiscal Years 2018, 2019, and 2020* requires the Security Executive Agent (SecEA), in coordination with the IC IG, submit a report detailing the controls employed by the IC to ensure that continuous vetting programs, including user activity monitoring, protect the confidentiality of whistleblower-related communications. Pursuant to the statute, the IC IG will support, as appropriate, the SecEA’s efforts in furtherance of this review.
FISCAL YEAR 2022 PEER REVIEWS

Audit

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 Inspectors General (OIGs) at CIA, DIA, NGA, NRO, and 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 Intelligence Community Offices of Inspectors General referenced above. The IC IG Audit Division was peer reviewed in FY 2020 and received a pass rating.

Inspections and Evaluations

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) established an external peer review program to assure OIGs and their stakeholders of an inspections and evaluations organization’s compliance with 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 organizations’ associated internal policies and procedures. External peer reviews provide a level of objectivity and independence in making this determination.

The IC IG’s Inspections and Evaluations (I&E) Division is scheduled to be peer reviewed in the 4th Quarter of FY 2021. Previous peer reviews of I&E occurred in 2014 and 2017. In advance of the peer review, I&E completed an update of the IC IG Inspections and Evaluations Manual to ensure that it aligns with current Division practices and procedures as well as the CIGIE Blue Book.

In 2021, I&E will support OIG peer reviews of CIA’s Inspections Program, NGA’s Inspections program, and DIA’s Inspections and Evaluations program.

As Chair of the IC IG’s Inspections Committee, the IC IG Assistant Inspector General for Inspections and Evaluations will continue to serve as the peer review coordinator for the Intelligence Community OIGs’ inspection and evaluations programs and provide updates to the CIGIE Inspections and Evaluations Committee.
APPENDIX A: THE AUDIT PROCESS

The IC IG’s Audit Division assesses whether the goals and objectives of the ODNI and IC 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:

- **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.

- **Entrance Conference**: This meeting provides agency stakeholders an opportunity to discuss the topic under review and the IC IG’s planned scope and methodology.

- **Planning**: The audit team gains an understanding of the program and plan work to answer the announced objectives.

- **Fieldwork Phase**: The audit team performs the analysis necessary to address the audit’s objectives. This phase includes collecting and assessing agency documents and conducting interviews.

- **Exit Conference**: The audit team briefs agency stakeholders on the IC IG’s results and conclusions.

- **Draft Report For Comment**: IC IG auditors provide the draft report to agency stakeholders for their official written response to the audit.

- **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.

- **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 (I&E) PROCESS

The IC IG Inspections and Evaluations Division’s mission is to conduct inspections, evaluations, and reviews of the programs and activities within the DNI’s responsibility and authority. The Council of the Inspectors General on Integrity and Efficiency (CIGIE) 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 ODNI components and IC 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:

1. **Announcement Memorandum**
   - IC IG inspectors communicate the intent to begin an inspection by issuing an announcement memorandum, which typically includes an overview of the topic and inspection focus.

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**
   - The inspection team develops an understanding of the program or topic and plan work to answer the inspection objectives.

4. **Fieldwork Phase**
   - IC IG inspectors work toward achieving the inspection objectives. This phase typically includes collecting and assessing agency documents and conducting interviews.

5. **Exit Conference**
   - This meeting provides agency stakeholders the opportunity to comment on the inspection team’s initial conclusions, emerging trends and recommendations.

6. **Draft Report For Comment**
   - IC IG inspectors provide the draft report to agency stakeholders for their official written response to the inspection.

7. **Final Report Issuance**
   - After IC IG inspectors receive the agency’s official response, they finalize the report and deliver it to the agency.

8. **Recommendation Follow-up**
   - After issuing the final report, IC IG inspectors work with designated points of contact to assess the status of the organization’s implementation recommendations. If actions taken resolve the issues reported, the recommendation(s) are closed.
APPENDIX C: THE INVESTIGATIONS PROCESS

The IC IG’s Investigations Division conducts or participates in independent and objective criminal and administrative investigations pertaining to programs and activities within the DNI’s responsibility and authority. Consistent with the IC IG’s unique statutory authority, the Investigations Division coordinates cross-Intelligence Community 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 Annual Work Plan. However, because investigations often result from a deliberate subversion of ODNI’s 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 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 minor are most 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

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 IC’s 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.

The IC IG’s 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 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) US Postal Service mail; (5) fax; and (6) drop boxes located in ODNI facilities.

Second, the Center, through the IC IG Hotline program, receives and processes allegations of “urgent concerns” pursuant to the Intelligence Community Whistleblower Protection Act (ICWPA), which has been codified as part of the IC IG’s authorizing statute, 50 United States Code § 3033(k)(5). The ICWPA established 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 within the responsibility and authority of the Director of National Intelligence involving classified information, but does not include differences of opinions 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.

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 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 (PPD-19), Protecting Whistleblowers with Access to Classified Information, and 50 U.S.C. §§ 3234 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.

For additional information about the whistleblower process, please visit our website at www.dni.gov/ICIG or contact Inspector General of the Intelligence Community Hotline at 855-731-3260.
APPENDIX E: OFFICE OF THE COUNSEL TO THE IC IG

The Counsel’s office ensures that the Inspector General, or the person acting in that capacity, and the other members of the IC IG team receive independent, confidential legal advice and policy counsel.

The Counsel team provides legal support and guidance designed to meet the unique needs of each IC IG component. In support of 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. To support the activities of the Audit Division and the I&E Division, the Counsel team identifies and interprets key policy, contract, and legal provisions relevant to reported observations, findings, and recommendations. In support of the IC IG’s whistleblower program, the Counsel team assists the Center in developing policies and procedures, evaluating whistleblower disclosures, and providing legal advice for ERPs. The Counsel team also provides enterprise legal and policy guidance, and reviews matters related to IC IG personnel, administration, training, ethics, independence, and budgetary functions. Attorneys from the Counsel’s office also participate in the Forum, the Forum’s Counsels Committee, the IC IG Data Analytics Working Group, and working groups of the Five Eyes Intelligence Oversight and Review Council.
One of the most significant ways the Inspector General of the Intelligence Community (IC IG) works to improve integration of the IC is through the Intelligence Community Inspectors General Forum (the Forum). By statute, the Forum consists of 12 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.
# APPENDIX G: ACRONYM LIST

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<th>Acronym</th>
<th>Description</th>
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<td>The Center</td>
<td>Center for Protected Disclosures</td>
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<td>CIA</td>
<td>Central Intelligence Agency</td>
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<td>CIGIE</td>
<td>Council of the Inspectors General on Integrity and Efficiency</td>
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<td>DIA</td>
<td>Defense Intelligence Agency</td>
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<td>DNI</td>
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<td>Intelligence Authorization Act</td>
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<td>Improper Payments Elimination and Recovery Act</td>
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<td>Office of the Director of National Intelligence</td>
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<td>Services of Common Concern</td>
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