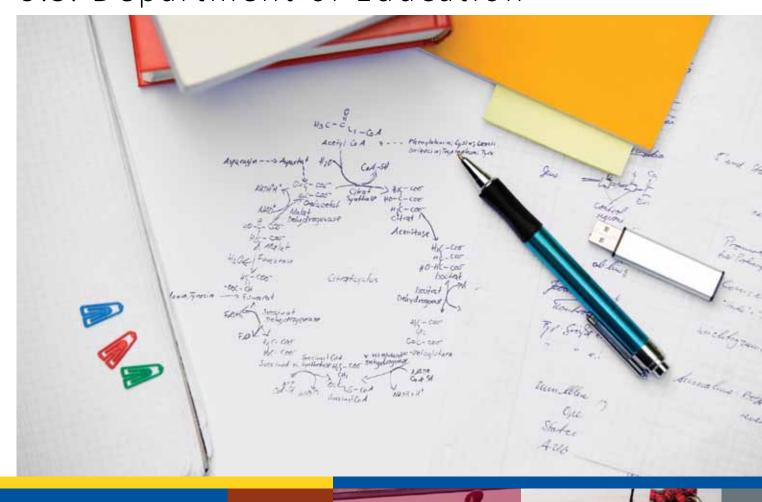
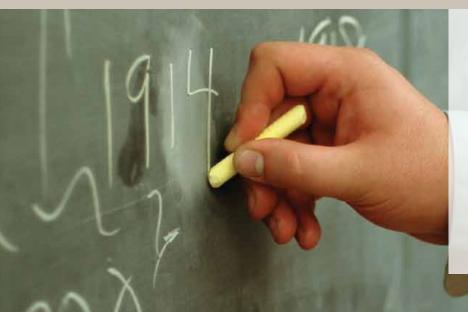
U.S. Department of Education





Office of Inspector General



FY 2011 Annual Plan

OFFICE OF INSPECTOR GENERAL Kathleen S. Tighe Inspector General

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Please Note: The Inspector General's Annual Plan is available on the ED/OIG Web site at www.ed.gov/offices/oig

Message from the Inspector General

I am pleased to provide the U.S. Department of Education (Department) Office of Inspector General (OIG) Annual Plan for fiscal year (FY) 2011. This Annual Plan presents the major initiatives and priorities this office intends to undertake to assist the Department in fulfilling its responsibilities to America's taxpayers and students.

The FY 2011 Annual Plan includes our FY 2011 Work Plan, detailing the assignment areas and resources we plan to devote to evaluations of the efficiency, effectiveness, and integrity of Department programs and operations. Our Work Plan incorporates suggestions from Department leaders and staff, the Office of Management and Budget, and members of Congress.

The Department will face a number of new challenges in FY 2011, perhaps nowhere more dramatic than in the area of student financial assistance. With the transition to the Direct Loan Programs underway, the Department is tackling new challenges in overseeing the Federal student aid programs. Addressing these challenges impacts almost every operational aspect of the agency—information technology, systems operations, financial reporting, staffing, customer service, and monitoring and oversight. OIG plans to dedicate a significant proportion of our resources in FY 2011 to the student financial assistance programs. In addition, we will continue to devote resources to ensuring that funds authorized under the American Recovery and Reinvestment Act of 2009, including the \$10 billion in emergency Federal education funds for States signed into law in August 2010, are used to achieve program goals and objectives in accordance with applicable laws, regulations, and Departmental guidance. Finally, we will continue to identify emerging risks and vulnerabilities throughout the agency's operations and Federal education programs, recommending corrective actions to ensure that Federal education funds are used for the purposes intended.

While this Annual Plan provides a framework for activities we intend to carry out in FY 2011, OIG is often required to perform unanticipated work based on legislative mandates, Congressional or Departmental inquiries, or government-wide reviews. We must be flexible enough to address these other priorities as they arise.

We look forward to continuing to work with the Department and the Congress in meeting our goals and fulfilling our mission.

Kathleen S. Tighe Inspector General

Kathleen S. Tighe



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U.S. Department of Education Office of Inspector General FY 2011 Annual Plan

Mission Statement

To promote the efficiency, effectiveness, and integrity of the Department's programs and operations, we conduct independent and objective audits, investigations, inspections, and other activities.

Introduction

The U.S. Department of Education (Department), Office of Inspector General (OIG) Strategic Plan for FY 2011 through FY 2015 sets forth our mission, vision, and goals for five years. Our mission is rooted in our statutory responsibilities under the *Inspector General Act of 1978*, as amended (IG Act). The IG Act established OIGs as independent and objective organizations within the Federal departments and agencies. The IG Act authorizes each OIG to:

- Conduct and supervise audits and investigations relating to its agency's programs and operations.
- Provide leadership, coordination, and recommend policies for activities
 designed to promote economy, effectiveness, and efficiency in the agency's
 programs and operations; and to prevent and detect fraud and abuse in the
 agency's programs and operations.
- Keep its agency head and Congress fully and currently informed of problems and deficiencies in the agency's programs and operations and on the status of corrective actions.

Strategic Plan

OIG's Strategic Plan for FY 2011-FY 2015 provides the roadmap by which we plan to accomplish our mission. To meet our mission, we have established the following goals (the OIG Strategic Plan is available on our Web site at www.ed.gov/oig):

GOAL 1: Improve the Department's ability to effectively and efficiently implement its programs to promote educational excellence and opportunity for all students.

GOAL 2: Strengthen the Department's efforts to improve the delivery of student financial assistance.

GOAL 3: Protect the integrity of the Department's programs and operations by detecting and preventing vulnerabilities to fraud, waste, and abuse.

GOAL 4: Contribute to improvements in Department business operations.

GOAL 5: Strive for a diverse and skilled workforce that is provided with the means and assistance necessary to achieve OlG's mission with excellence, accountability, and integrity.

The first four goals focus on our responsibilities under the IG Act to promote economy, efficiency, and effectiveness and to prevent and detect waste, fraud, and abuse. The fifth goal focuses on the internal functions of the OIG and provides the foundation for our capacity to achieve the other four goals now and in the future. More details are available in the OIG Strategic Plan on the specific strategies developed for each goal and associated performance measures. The FY 2011 performance measures for the goals are presented in Appendix A to this Plan.

FY 2011 Management Challenges

For FY 2011, OIG identified the following areas as significant management challenges for the Department (the full management challenges report is available in a separate report on our Web site at www.ed.gov/oig):

- Implementation of New Programs/Statutory Changes, including the American Recovery and Reinvestment Act of 2009 (Recovery Act) and changes to the Student Financial Assistance (SFA) loan programs;
- Oversight and Monitoring, including SFA program participants, distance education, grantees, and contractors;
- Data Quality and Reporting, including program data and Recovery Act reporting requirements; and
- Information Technology Security.

FY 2011 Work Plan

The FY 2011 Work Plan for audit, inspection, investigation, and other activities are presented under each of the first four goals in the sections that follow. Table 1 correlates the FY 2011 Work Plan projects to the FY 2011 Management Challenges. In addition to the OIG goals and FY 2011 Management Challenges, we also assessed the work proposed in terms of the availability of the necessary resources to accomplish it.

Goal 1: Improve the Department's ability to effectively and efficiently implement its programs to promote educational excellence and opportunity for all students.

Our audit work in the area of promoting educational excellence and opportunity for all students includes specific work being conducted pursuant to the Recovery Act and its goals of promoting economic recovery and education reforms, as well as other Department programs. Our investigations will focus on serious allegations of fraud and corruption involving Recovery Act funded programs. While our work related to the SFA programs would also contribute to this goal, planned work in SFA programs is provided under Goal 2. Priority work for Goal 1 in FY 2011 will include the following:

RECOVERY ACT PROGRAMS:

- Recipient and Subrecipient Use of Recovery Act Funds to Meet Program Objectives—Continue our ongoing work and conduct additional audits and investigations of recipients and subrecipients to determine whether Recovery Act funds were used to meet program objectives, or were obtained or used lawfully. Additional planned work related to specific programs is presented below. In general for FY 2011, our approach to reviews of Recovery Act funds will evaluate:
 - Whether funds are being used in ways that meet the objectives of the Recovery Act and the specific programs;
 - What additional services are being provided with Recovery Act funding;
 - The progress made in meeting program objectives; and
 - The effectiveness of the Department's oversight and monitoring of recipients' progress in meeting program objectives.
- State Educational Agency (SEA) Award and Monitoring of School Improvement Grants (SIG)—Determine whether SIG funds were appropriately awarded and effectively monitored by SEAs.
- Race to the Top Fund (RTT) Grant Monitoring Process—Review the adequacy and effectiveness of the Department's monitoring to ensure RTT

program goals and objectives are met. Work may also include reviews at one or more grantees. Note: The Government Accountability Office (GAO) has been mandated to conduct a review in this area; we will continue to coordinate with GAO so as not to duplicate efforts.

- Discretionary Grant Monitoring Process for Investing in Innovation (i3) Funds—Review the adequacy and effectiveness of the Department's plans for monitoring performance to ensure i3 program goals and objectives are met. Work may also include reviews at one or more grantees. As above, GAO has been mandated to conduct a review in this area, and we will continue to coordinate with GAO so as not to duplicate efforts.
- Oversight of State Fiscal Stabilization Fund (SFSF) Use—Determine
 whether the Department is conducting appropriate monitoring of SFSF funds
 to ensure program objectives are met and to limit use of the funds in support
 of activities that may be unsustainable after Recovery Act funds expire.
- Centers for Independent Living (CIL) Controls over Recovery Act
 Funds—Continue our work to determine whether effective fiscal controls are in place to safeguard Recovery Act funds provided to CIL.
- Department's Data Quality Processes for Recovery Act Recipient
 Reporting—Continue our reviews to determine whether Recovery Act data reported by recipients and subrecipients are accurate, reliable, and complete.

OTHER PROGRAMS (may include a combination of Recovery Act and other funding):

- State Monitoring of Individuals with Disabilities Education Act (IDEA), Part B, Maintenance of Effort (MOE)—Evaluate whether IDEA MOE provisions—requirements to maintain a minimum level of funding for education programs—are being met, whether waivers are granted only to eligible entities, and the potential long-term impact on funding for special education programs.
- Effectiveness of the Competitive Award Process for Elementary and Secondary Education Act (ESEA) Programs—Evaluate the effectiveness and efficiency of the competitive grant processes for ESEA programs in ensuring the highest rated grantees are selected and that necessary controls are in place to mitigate risk.
- Use and Accuracy of Performance Data Collected and Reported in EDFacts—Evaluate the relevance of data in EDFacts to ensure only needed data is being collected and that controls ensure data is accurate and reliable to support management decisions.

- Potentially Overlapping High School Programs—Continue our work to assess the extent to which high school programs, administered by the Office of Postsecondary Education, Office of Vocational and Adult Education, and Office of Elementary and Secondary Education, are complementary, rather than duplicative.
- Discretionary Grant Results—Determine whether the information provided in grantee final reports meets requirements, is used to evaluate the success of individual projects and the grant program as a whole, and is disseminated to allow potential grantees to replicate and/or build upon successful programs and to provide transparency to the general public on grant costs and results.
- Department Performance and Accountability Planning and Reporting Processes—Evaluate the program performance reporting process to determine whether complete, accurate information is provided to allow evaluation of program results.

Goal 2: Strengthen the Department's efforts to improve the delivery of student financial assistance.

Our planned work in the SFA programs includes emphasis on the additional volume of loans that will be originated under the William D. Ford Federal Direct Loan program (Direct Loan Program) with the elimination of new Federal Family Education Loan Program (FFELP) loans after June 30, 2010. This will include work related to Distance Education, Departmental oversight of schools, and the new Teacher Education Assistance for College and Higher Education (TEACH) grants program. We will also continue to devote significant resources towards the investigation of allegations of fraud in SFA programs, with an ongoing focus on Distance Education programs. Priority work to be performed in FY 2011 will include the following:

- Oversight of Schools Participating in the Direct Loan Program—
 Evaluate the effectiveness of Federal Student Aid (FSA) oversight of schools participating in the Direct Loan Program to ensure compliance with program requirements and the prompt disbursement of Direct Loan funds.
- Title IV of the Higher Education Act of 1965, as amended (Title IV)
 Additional Servicers—Evaluate the effectiveness of the Department's management of the Title IV Additional Servicers, referred to as TIVAS, contracts to ensure appropriate contractor performance and accountability.
- Guaranty Agency Health—Evaluate the effectiveness of the Department's activities to ensure effective performance of guaranty agencies during the phase-out of FFELP loans.
- Job Retention at Loan Servicers—Evaluate whether the Department used the funds for the intended purpose, loan servicers adequately

supported their claims for job retention payments, and the payments were effective in retaining jobs at the servicers' locations.

- Proprietary Schools' Participation in Student Financial Aid Programs— For SFA programs funds delivered to students attending proprietary schools, determine how the funds are used and if schools are providing students training that results in placement in that field.
- Accrediting Agency and Department Approval of Proprietary School
 Change of Ownership—Evaluate accrediting agency and Department
 practices for approving changes in ownership that result in a non-profit school
 becoming a for-profit school to ensure that the certification process is used
 appropriately to determine eligibility for participation in the SFA programs.
- **TEACH Grants Program**—Evaluate the controls that the Department has implemented to ensure that TEACH grant recipients either perform their agreed teaching service or repay their TEACH grants under the Direct Loan Program.
- Ensuring Continued Access Student Loan Act (ECASLA) Servicer
 Compliance—Complete our reviews to determine whether servicers are in compliance with the terms of the servicing agreement.
- ECASLA Custodian Billings and Financial Transactions—Complete our work to determine whether the custodian is inappropriately affiliated with the sponsor, oversight provided by the custodian ensures compliance with the terms of the servicing agreement, and distributions of collection account funds are in compliance with the terms of the master agreement.
- FSA's Monitoring of Financial Responsibility—Continue our review to determine whether FSA is taking appropriate action when it has information indicating that an institution is experiencing financial responsibility difficulties.

Goal 3: Protect the integrity of the Department's programs and operations by detecting and preventing vulnerabilities to fraud, waste, and abuse.

The continuing and planned work under Goals 1, 2, and 4 contributes to OIG's work under this goal. Through our audit and investigative work, proactive data analyses, and other reviews, we assess fraud risk, evaluate fraud indicators, and perform testing designed to detect fraud, waste, and abuse. Our investigations, audit, inspections, and computer forensics staff work together to help identify weaknesses in internal controls that could leave the Department's programs or operations vulnerable to these risks. The result of this interdisciplinary work can result in criminal and civil investigations of fraud in the Department's programs and operations; it is also evaluated for potential audits and inspections. For FY 2011, the

following priority projects in particular will evaluate potential risks and vulnerabilities to fraud, waste, and abuse in Department programs:

- Oversight of Charter Schools—Based on past and continuing investigative work, complaints and other concerns received, we will evaluate the potential risks involved in the charter school program. We will determine whether Department, SEA, and authorizing entity oversight and monitoring activities are effective in ensuring that charter schools meet program goals and objectives, and funds are used for intended purposes.
- 21st Century Community Learning Centers (CCLC) Program—Based on past and continuing investigations and other concerns received, we will evaluate the vulnerabilities and risks in the CCLC program. We plan to evaluate whether CCLC program grants are awarded and monitored effectively to ensure that funds are spent for the intended purposes and that program objectives are being met.
- Process to Identify and Monitor High-Risk/At-Risk Grantees—Continue our work to evaluate the effectiveness of the Department's process for identifying and designating high-risk/at-risk grantees, the effectiveness of the monitoring approach for these grantees, and determine whether the approach has resulted in improvement in grantee performance.
- **Distance Education Program Requirements and Monitoring**—Based on past and continuing audit and investigative work, evaluate the adequacy of current distance education requirements, Department and/or accrediting agency monitoring, and school compliance with requirements in administering SFA programs.
- Oversight of Non-Federal Auditors—Under the IG Act, OIG is responsible for oversight of non-Federal auditors. To this end, OIG develops and issues guidance and provides technical assistance to non-Federal auditors. OIG also conducts quality reviews of single audits and compliance audits conducted by non-Federal auditors to determine whether the audits were conducted in accordance with appropriate audit standards and applicable audit guidance.
- OlG/FSA Fraud Project—Continue our joint interdisciplinary project with FSA to identify risk indicators and schools participating in the SFA programs that may not be complying with program requirements or committing fraud. This project is currently focused on schools offering distance education because of the recent, significant increase in enrollment and funding for these programs, and vulnerabilities identified in our audits and investigations involving these programs.
- Data Mining and Research—Continue to develop and utilize tools that can be used to identify adverse trends and possible fraud, waste, and

abuse in Department programs or operations. Using an interdisciplinary approach, we plan to establish risk assessment projects focusing on Title IV schools that are a high risk of being targets of fraudulent activities, as well as identifying the most at risk Recovery Act award projects from an audit/investigative perspective. We are also establishing a forensic analytical project to detect electronic fraud activities, such as school enrollment irregularities, student aid fraud rings, and identity theft within the Federal student aid arena.

■ Hotline Operations — OlG's Hotline continues to provide a means for anyone suspecting fraud, waste, or abuse involving Department funds or programs to provide their concern to OlG. Complaints or concerns received through the Hotline are evaluated and may be referred for OlG investigation, audit or other review, or may be referred to other offices or agencies as appropriate. The Hotline can be contacted through OlG's Web site, by email, telephone, fax machine, or regular U.S. mail delivery.

Goal 4: Contribute to improvements in Department business operations.

In addition to the Department's administration of its programs, effective and efficient business operations are critical to ensure the Department has the tools and other resources to effectively manage its programs and protect its assets. Our audit and inspection work will look at procurement, IT security, financial management and other areas; our investigations work will cover allegations of serious fraud or misconduct by Department officials and contractors, as well as technology-related crimes. Priority work planned in this area, as well as statutory reviews for FY 2011, include the following:

- Management of the Education Department Utility for Communications, Applications, and Technology Environment (EDUCATE) Contract— Continue our series of work related to the effectiveness of the Department's management of the EDUCATE contract and the adequacy of the contractor's performance to ensure the contractor provides the level of service expected and required to support the Department's information technology (IT) infrastructure.
- Suspension and Debarment Functions for Grantees—Evaluate whether the Department is effectively using the suspension and debarment process for non-FSA and non-procurement entities and individuals.
- Federal Real Property Assistance Act (FRPA) Program Evaluate the Department's process for awarding parcels of surplus real property under the FRPA program and monitor the use of the property to ensure program goals and objectives are met.

- Audit Resolution Process—Continue our review of the effectiveness and timeliness of the Department's external audit resolution process.
- System Security Controls over the Education Central Automated Processing System (EDCAPS)—Continue our review to evaluate information security plans, programs, and practices in accordance with the *E-Government Act*, Federal Information Security Management Act (FISMA), and the Privacy Act.
- System Security Controls over EDUCATE—Continue our evaluation to determine whether IT security and management controls are in place for EDUCATE, including the safeguarding of personally identifiable information (PII).
- Security Controls over External FSA Data Centers—Determine whether the Department has adequate IT security controls in place at selected external FSA sites that process, store, and/or transmit electronic data on behalf of the Department or FSA, including the safeguarding of PII.
- FY 2011 Department-wide Financial Statement Audit—Provide oversight and monitoring of independent public accounting firm contracted to report as to whether the Department-wide basic financial statements are fairly presented in all material respects. With respect to the financial statements, report on whether internal control provides reasonable assurance of achieving objectives, and whether the Department has complied with applicable laws and regulations.
- FY 2011 FSA Financial Statement Audit—Provide oversight and monitoring of independent public accounting firm contracted to provide an opinion as to whether the FSA financial statements are fairly presented in all material respects. With respect to the financial statements, report on whether FSA's internal control provides reasonable assurance of achieving objectives, and whether FSA has complied with applicable laws and regulations.
- FY 2011 Special Purpose Financial Statement Audit—Provide oversight and monitoring of independent public accounting firm contracted to report on whether the Department's special-purpose financial statements fairly present, in all material respects, in conformity with applicable accounting principles and requirements, the assets, liabilities, and net position as well as net costs and changes in net position.
- FISMA Report—Assess the agency's overall compliance with the security provisions of FISMA and related information security standards identified within Office of Management and Budget (OMB) guidelines.
- Reviews of Improper Payments and Related Requirements—Evaluate
 the Department's compliance with the Improper Payments Improvement Act
 and subsequent legislation and guidance by performing mandated reviews/

oversight of the Department's improper payment reports and processes and the effectiveness of the Department's use of recovery auditing.

 Review of the Department's Accounting for Drug Control Funds and Related Performance—In accordance with statutory requirements, express a conclusion about the reliability of the Department's management assertions related to the National Drug Control Program activities.

Other Activities

The IG Act also provides that OIG is responsible for reviewing existing and proposed legislation and regulations related to the programs and operations of the Department. OIG accomplishes this in several ways as follows:

- Review and comment on draft legislation, regulations, comments to the Department on its proposed policies, procedures, and guidance, observe negotiated rulemaking sessions, and participate in an advisory capacity on Departmental policy groups.
- Review and comment on pending legislation or regulations of other agencies that impact the Department, its recipients, and/or entities participating in Department programs.
- Provide recommendations to Congress for consideration during the reauthorization process for Department programs.
- Review and provide comments to OMB on proposed regulations, including participation on OMB workgroups to draft and revise regulations.

OlG also performs a number of other activities related to its obligation to keep Congress informed about any problems or deficiencies with the Department's administration of its programs and operations, including participation in crossagency groups:

- Respond to Congressional requests for information or analysis.
- Participate as a member of the Council of Inspectors General for Integrity and Efficiency (CIGIE), including the committees for Audit, Investigation, and IT. Also participate in interagency workgroups sponsored by CIGIE, including the Federal Audit Executive Council, the Assistant Inspector General for Investigations Committee, and the Council of Counsels to the Inspectors General.
- Participate as a member of the Recovery Accountability and Transparency Board and its committees. Lead or participate in projects to evaluate Recovery Act programs across agencies.

Table 1 FY 2011 Work Plan and FY 2011 Management Challenges

This table includes both planned and ongoing projects presented in the FY 2011 Work Plan projects under the FY 2011 Management Challenges. Ongoing work is indicated with an asterisk. This table includes discretionary work only—OIG audits and other reviews required by statute are not included.

MANAGEMENT CHALLENGE	CHALLENGE RELATED FY 2011 WORK PLAN PROJECTS					
Implementation of New Programs/Statutory Changes—including the Recovery Act and Changes to the SFA Loan Programs	 Recipient and Subrecipient Use of Recovery Act Funds to Meet Program Objectives Race to the Top Grant Monitoring Process Discretionary Grant Monitoring Process for i3 Funds Oversight of SFSF Centers for Independent Living Controls over Recovery Act Funds * Guaranty Agency Health Job Retention at Loan Servicers 					
Oversight and Monitoring—including SFA program participants, distance education, grantees, and contractors	 FSA Oversight of Schools Participating in the Direct Loan Program Proprietary Schools' Participation in SFA Programs Approval of Proprietary School Change of Ownership TEACH Grants Program ECASLA Servicer Compliance * ECASLA Custodian Billings and Financial Transactions * FSA Monitoring of Financial Responsibility * Distance Education Program Requirements and Monitoring SEA Award and Monitoring of SIG State Monitoring of IDEA, Part B, MOE Effectiveness of the Competitive Award Process for Elementary and Secondary Education Act Programs Potentially Overlapping High School Programs * Discretionary Grant Results Oversight of Charter Schools 21st Century Community Learning Centers Program Process to Identify and Monitor High-Risk/At-Risk Grantees* Suspension and Debarment functions for Grantees Federal Real Property Assistance Program Title IV Additional Servicers Contracts Management of the EDUCATE Contract Audit Resolution Process * 					
Data Quality and Reporting —including program data and Recovery Act reporting requirements	 Use and Accuracy of Performance Data Collected and Reported in EDFacts Department Performance and Accountability Planning and Reporting Process Department's Data Quality Processes for Recovery Act Recipient Reporting 					
Information Technology Security	ystem Security Controls Over Education Department Centralized automated Processing System ystem Security Controls Over EDUCATE ecurity Controls Over External FSA Data Centers					

Appendix A FY 2011 Performance Measures

	PERFORMANCE MEASURE	FY 2011 TARGET
1.	Audits, inspections, and investigations initiated each year that focus on areas of high risk or significant importance. Measures have been separately established for Audit Services (AS), Investigation Services (IS), Evaluation, Inspection and Management Services (EIMS), and Information Technology Audit and Computer Crime Investigations (ITACCI) as indicated.	70% ITACCI Audits - 85%
2.	Recommendations accepted by the Department during the fiscal year.	85%
3.	Audit and inspections initial results determined by the agreed-upon date.	AS – 70% EIMS – 80% ITACCI – 70%
4.	Audit and inspection field work completed and draft report submitted for review by the agreed-upon date.	AS – 70% EIMS – 80% ITACCI - 70%
5.	Draft and final audit and inspection reports issued by the agreed-upon date.	70%
6.	Case closing Reports of Investigations submitted within 90 days of last reportable investigative action.	75%
7.	Complaints of fraud, waste, and abuse evaluated and closed to a final disposition within 90 days.	70%
8.	Closed investigations that resulted in a criminal, civil or administrative action, or monetary result.	65%
9.	Proactive analytical projects that resulted in a criminal or other referral or identification of a vulnerability.	65%
10.	Comments that resulted in changes in legislation, regulations, or other policies.	60%
11.	Counsel work products meeting required or agreed-upon deadlines.	80%
12.	Freedom of Information Act responses meeting required deadlines.	97%
13.	Requests for forensic or analytical assistance completed within 75 days.	65%
14.	Computer assisted assessment technology products delivered to the requestor within agreed-upon dates.	90%
15.	Budget products developed and delivered to OMB, Department, OIG leadership, and other applicable stakeholders within agreed upon timeframes.	80%
16.	Report to appropriate stakeholders on Recovery Act activities and funding within established timeframes.	90%
17.	OIG Data Analytics Systems are operational during normal work hours.	95%
18.	Operational staff take at least one work-related training.	70%
19.	Increase professional certifications/advanced degrees held by staff.	5%

Anyone knowing of fraud, waste, or abuse involving U.S. Department of Education funds or programs should call, write or e-mail the Office of Inspector General.

Call Toll-Free:

The Inspector General Hotline 1-800-MISUSED (1-800-647-8733)

Or Write:

Inspector General Hotline U.S. Department of Education Office of Inspector General 550 12th St. S.W. Washington, DC 20024

Or E-Mail:

oig.hotline@ed.gov

Your report may be made anonymously or in confidence.

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