



Office of Inspector General

February 6, 2026

TO: David Foley
Chief of Benefits Administration

Alice Maroni
Chief Management Officer

Michael Rae
Deputy Chief Policy Officer

FROM: John Seger
Assistant Inspector General Audits, Evaluations, Inspections

SUBJECT: Follow-Up Evaluation of PBGC's Oversight of Contract Invoices
(EV-26-196)

The Office of the Inspector General is initiating a follow-up engagement on Contracting Officer Representatives (COR) oversight of contract invoices. Please see the enclosure for more specific details on the engagement and for topics we plan to discuss at the entrance conference. We will begin work on this engagement immediately, so we would appreciate your notifying the appropriate staff.

The next step will be to conduct an entrance conference which we will coordinate with the Corporate Controls and Reviews Department. At the entrance conference, we request PBGC provide any feedback on the planned engagement.

Thank you in advance for your time and consideration.

cc: Janet Dhillon, Director
LaTasha Thomas, Special Advisor to the Director, OD
Charlie Bolton, Senior Policy Advisor, OD
Lisa Carter, Acting CFO/Director, CCRD
Karen Morris, General Counsel
Latrece Wade, Risk Management Officer

Follow-Up Evaluation of PBGC's Oversight of Contract Invoices

Subject: Follow-Up Evaluation of PBGC's Oversight of Contract Invoices

Source for the Work: Prior Engagements

Objective:

Determine whether PBGC Office of Benefits Administration and Office of Policy and External Affairs effectively implemented recommendations 2023-04-01, 2023-04-02, and 2024-11-08 to establish controls that ensure COR review of contract invoices.

Entrance Conference Discussion Topics:

1. Explain how the Procurement Department assists CORs across the PBGC with tools for invoice reviews, such as invoice review checklists, logs, trackers, and best practices training.
2. Since closure of the RCF packages, have any changes to the invoice review processes been made?
3. Has OPEA or OBA seen impacts of the more robust invoice reviews?
4. Have other departments adopted similar invoice review procedures?

Documentation Requested for the Entrance Conference:

1. A list of all labor-hour and time & materials contracts at OBA and OPEA in effect in 2025 and 2026.
2. Latest invoice review SOPs from OBA and OPEA.
3. Latest invoice review guidance from the Procurement Department including relevant PBGC FAR information.
4. A list of COR related training and attendee rosters held in 2025 and 2026

Points of Contact Requested:

1. Main points of contact in OBA, OPEA, and OMA for the OIG team to coordinate with.

Estimated Report Issuance: To be determined once sample contracts are obtained

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OIG Contacts:

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