

PENSION BENEFIT GUARANTY CORPORATION OFFICE OF THE INSPECTOR GENERAL



Annual Work Plan *Calendar Year 2025*

Our Value Framework

Values	Respect – Integrity – Objectivity and Independence – Excellence
Vision	Providing deep knowledge and sensible solutions through independent, positive engagement.
Mission	<p>Conduct independent and objective audits and investigations of PBGC programs and operations.</p> <p>Provide leadership to promote efficiency and effectiveness.</p> <p>Prevent and detect fraud and abuse in PBGC programs and operations.</p> <p>Keep the Board and Congress fully and currently informed about problems and deficiencies.</p> <p>Report immediately to the Board whenever the Inspector General becomes aware of any particularly serious or flagrant problems.</p> <p>Report expeditiously to the Attorney General whenever the Inspector General has reasonable grounds to believe there has been a violation of federal criminal law.</p>
Pillars	People Focused – Process Oriented – Performance Driven

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Introduction

We conduct our business in accordance with the Office of Inspector General (OIG) Value Framework and strive to provide deep knowledge and sensible solutions through independent positive engagement. To fulfill our responsibilities under the Inspector General Act and our expectations under the OIG Value Framework, we issue a broad range of products including audits, evaluations, inspections, investigations, reviews, risk advisories, and white papers.

The work plan for Calendar Year 2025 falls into three categories:

- **Ongoing:** Engagements that were ongoing at the beginning of the Calendar Year 2025.
- **Mandatory:** Engagements that are statutorily required.
- **Discretionary:** Engagements that are planned or under consideration based on risks facing the PBGC and after evaluating suggested topics from stakeholders.

We developed this plan after considering OIG's strategic plan and goals; PBGC's three strategic goals; the OIG's FY 2024 Risk Assessment of PBGC Programs and Operations (including fraud risk); the OIG's Top Management Challenges; prior audit and investigative work; and risk assessment information provided by the Corporation. We selected discretionary evaluations based on risk. We prioritized evaluations to address risk and make the best use of available OIG resources.

The evaluation priority ratings are as follows:

Critical Risk – Immediate attention is required. Issues under review have the potential to involve a serious internal control or risk management issue that if not mitigated, may lead to:

- Substantial financial losses, possibly in conjunction with other weaknesses in the control framework or the organizational entity or process being audited.
- Serious violation of a rule, regulation, or law.
- Serious reputation damage, such as negative publicity in national or international media.

High Risk – Timely management attention is warranted. This is an internal control or risk management issue that could lead to:

- Financial losses.
- Loss of controls within the organizational entity or process being audited.

- Reputation damage, such as negative publicity in local or regional media.

Medium Risk – Routine management attention is warranted. This is an internal control or risk management issue, the solution to which may lead to improvement in the quality and/or efficiency of the organizational entity or process being audited. Risks are limited.

PBGC Strategic Goals – This workplan also notes how planned engagements relate to PBGC's three strategic goals:

1. preserve plans and protect the pensions of covered workers and retirees,
2. pay pension benefits on time and accurately, and
3. maintain high standards of stewardship and accountability.

Initiation, Acceptance, Continuation of Engagements

Government Auditing Standards (GAS) require audit organizations to establish policies and procedures for the initiation, acceptance, and continuance of engagements designed to provide reasonable assurance the organization will undertake engagements only if it:

- a. complies with professional standards, applicable legal and regulatory requirements, and ethical principles;
- b. acts within its legal mandate or authority; and
- c. has the capabilities, including time and resources, to do so (GAS 5.51).

OIG organizations operate with limited resources, which requires that evaluations be prioritized. In addition, there may be cases where an OIG is asked or required to accept an engagement. Even with these constraints, however, it remains critical that independence, objectivity, and adherence to professional standards are maintained at all times to ensure the integrity of OIG operations. As such, each year as part of the Annual Planning Process GAS 5.51 is reviewed and the principles identified in a, b, and c above are considered as an important part of the audit planning process.

Ongoing Engagements

Audit of PBGC's Software Attestation Efforts

(Project No. PA-25-185, announced November 18, 2024)

https://oig.pbgc.gov/pdfs/Ann_PA-25-185.pdf

Evaluate PBGC's efforts regarding the software self-attestation requirements.
(PBGC Strategic Goals 1 and 3 and OIG Risk Rating: High)

Evaluation of PBGC's Annual Compliance Review for Plans Receiving Special Financial Assistance

(Project EV-24-183, announced May 22, 2024)

https://oig.pbgc.gov/pdfs/Ann_EV-24-183.pdf

To assess whether the PBGC's design of its Annual Statement of Compliance (ASOC) review policies and procedures provides reasonable assurance that the use of SFA funds complies with ERISA requirements. (PBGC Strategic Goals 1, 2, and 3 and OIG Risk Rating: Critical)

Evaluation of PBGC's ServiceNow Support Desk

(Project EV-24-178, announced February 8, 2024)

https://oig.pbgc.gov/pdfs/Ann_PA-25-185.pdf

Evaluate PBGC's oversight and administration of the ServiceNow Support Desk operations. (PBGC Strategic Goals 3 and OIG Risk Rating: Critical)

Evaluation of PBGC's Contract Type Justifications

(Project No. EV-23-175, announced July 10, 2023)

https://oig.pbgc.gov/pdfs/Ann_EV-23-175.pdf

Determine if PBGC complied with federal acquisition requirements to justify contract types, when awarding other than firm-fixed price contracts.
(PBGC Strategic Goal 3 and OIG Risk Rating: Critical)

Mandatory Engagements

PBGC's Fiscal Year 2024 Compliance with the Payment Integrity Information Act of 2019

To determine PBGC's FY 2024 compliance with requirements of the Payments Integrity Information Act of 2019. (PBGC Strategic Goals 1, 2, and 3 and OIG Risk Rating: High)

Audit of PBGC's Fiscal Years 2025 and 2024 Financial Statements

Oversight of the independent public accountant hired to express an opinion on whether PBGC's financial statements are prepared in accordance with prescribed accounting principles. Scope includes (1) General-purpose financial statement, including internal controls and (2) Closing package. (PBGC Strategic Goals 1, 2, and 3 and OIG Risk Rating: Critical)

Annual Evaluation of the PBGC Federal Information Security Modernization Act Program

Oversight of independent public accountant hired to evaluate PBGC's information security program. As prescribed by the Federal Information Security Modernization Act, the PBGC OIG is required to conduct annual evaluations of PBGC's security programs and practices, and to report the results of these evaluations to the Office of Management and Budget. (PBGC Strategic Goal 3 and OIG Risk Rating: Critical)

Discretionary Engagements - Planned

PBGC's Internal Controls related to Contract Pre-Award

This engagement would determine internal control weaknesses in the PBGC's pre-award process for contracting. (PBGC's Strategic Goal 3 and OIG Risk Rating: High)

PBGC's Review of Reinstatement of Benefits for Participants in Plan's Receiving Special Financial Assistance

This engagement would review a sample of plans that received SFA for reinstatement of benefits to determine if recipients received benefits correctly and timely. (PBGC Strategic Goals 1, 2, and 3 and OIG Risk Rating: Critical)

PBGC's Trusteeship of Small Single-Employer Pension Plans

This engagement would review PBGC's process for trusteeship of single-employer plans with fewer than 10 participants. (PBGC Strategic Goals 1 and 2 and OIG Risk Rating: Critical)

Assessment of the Effectiveness of PBGC's Internal Controls in Reviewing Annual Statement of Compliance Certifications for Plans Receiving Special Financial Assistance

This engagement will assess the effectiveness of PBGC's internal controls by reviewing a sample of the Annual Statement of Compliance Certifications. The evaluation will examine how well PBGC's policies and procedures were applied to ensure consistent and accurate determination of SFA compliance. (PBGC Strategic Goals 1, 2, and 3 and OIG Risk Rating: Critical)

PBGC's Succession Planning

This engagement would evaluate the completeness of PBGC's succession planning, utilizing the PBGC Succession Planning Toolkit. (PBGC Strategic Goal 3 and OIG Risk Rating: Medium)

Discretionary Engagements - Under Consideration

PBGC's Plan Promotion Process from Non-Seriatim to Seriatim Valuation

This engagement would assess PBGC's process promoting plans from non-seriatim valuation to seriatim valuation.
(PBGC's Strategic Goal 3 and OIG Risk Rating: High)

Follow-Up: PBGC's Contracting Officer Representatives Invoice Reviews

This engagement would determine whether PBGC effectively implemented corrective actions to address issues and recommendations identified in PBGC


OIG's report [*Evaluation of Hotline Complaints regarding a PBGC Contract \(EVAL-2023-04\)*](#). (PBGC's Strategic Goal 3 and OIG Risk Rating: High)

PBGC's Oversight of Plan Asset Evaluations and Participant Data Reviews

This engagement would assess the Office of Benefits Administration's oversight of the work performed by the contractors on Plan Asset Evaluations and Participant Data Reviews. (PBGC's Strategic Goals 2 and 3 and OIG Risk Rating: High)

PBGC's Directives System


This engagement would evaluate whether the PBGC's Directives System ensures proper maintenance and disposition of the Corporation's directives. (PBGC Strategic Goal 3 and OIG Risk Rating: Critical)



OFFICE OF INSPECTOR GENERAL HOTLINE

**Suspect Fraud, Waste, Abuse,
Or Mismanagement?**

LET'S TALK!




**Workers and Retirees
are Counting on You!**

Call the Hotline at 1-800-303-9737

Or write to:
Pension Benefit Guaranty Corporation
Office Of Inspector General Hotline
445 12th St SW
Washington, D.C. 20024-2101
Website: oig.pbgc.gov

Or e-mail to:
hotline@pbgc.gov

Your report can be made anonymously or in confidence



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