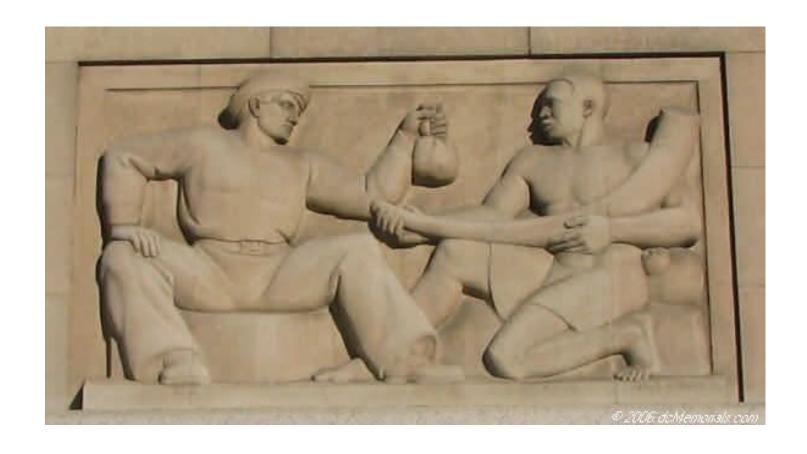


## FEDERAL TRADE COMMISSION OFFICE OF INSPECTOR GENERAL SEMIANNUAL REPORT TO CONGRESS

October 1, 2012—March 31, 2013

Report No. 49



ABOVE: THIS RELIEF ENTITLED "FOREIGN TRADE" WAS CREATED BY ARTIST CARL L. SCHMITZ IN 1938

IT IS ONE OF FOUR LIMESTONE RELIEFS ABOVE THE ENTRANCE DOORS OF THE FEDERAL TRADE COMMISSION BUILDING ON 600 PENNSYLVANIA AVE. NW, WASHINGTON DC.

COVER: The cover is a close-up of the Federal Trade Commission Building.

#### FEDERAL TRADE COMMISSION MISSION

The Federal Trade Commission (FTC) is an independent agency of the United States government established in 1914 by the Federal Trade Commission Act (15 U.S.C. §41-58, as amended). The FTC has two critical goals: protecting consumers and maintaining competition. The FTC's mission is to prevent business practices that are anticompetitive or deceptive or unfair to consumers; to enhance informed consumer choices and public understanding of the competitive process; and to accomplish these mission without unduly burdening legitimate business activity.

The FTC's mission is carried out by three bureaus: The Bureau of Consumer Protection, the Bureau of Competition and the Bureau of Economics. Work is aided by offices including the Office of General Counsel, the Office of Inspector General, the Office of International Affairs, the Office of the Executive Director, and seven regional offices. The FTC is headed by a commission composed of five commissioners, nominated by the President and confirmed by the Senate, each serving a seven-year term.

The FTC seeks to ensure that the nation's markets are competitive, efficient and free from undue restrictions. The FTC also seeks to improve the operations of the marketplace by ending unfair and deceptive practices with emphasis on those practices that might unreasonably restrict or inhibit the free exercise of informed choice by consumers. The FTC relies on economic analysis to support its law enforcement efforts and to contribute to the economic policy deliberations of Congress, the Executive Branch and the public.

Many of the FTC's resources can be accessed through its website www.ftc.gov.



 $\ensuremath{\mathit{ABOVE}}$ : THIS RELIEF ENTITLED "SHIPPING" WAS CREATED BY ARTIST ROBERT LAURENT IN 1938

More information on the National Register of Historic Places is available on the GSA Historic Buildings Program website http://www.gsa.gov/portal/category/21010.

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#### UNITED STATES OF AMERICA

#### FEDERAL TRADE COMMISSION

WASHINGTON, D.C. 20580

OFFICE OF INSPECTOR GENERAL

April 30, 2013

#### A MESSAGE FROM THE INSPECTOR GENERAL

On behalf of the Federal Trade Commission (FTC) Office of Inspector General (OIG), I am pleased to present our Semiannual Report to Congress for the period ended March 31, 2013.

During this semiannual period, the OIG processed 44 consumer complaints and allegations of possible wrongdoing. We opened 3 new investigations and closed 14 complaints during the current reporting period. We referred 24 complaints to appropriate FTC program offices with no further action and 3 to other federal agencies.

We also oversaw the independent annual audit of the FTC's financial statements. For the 16th consecutive year, the FTC received an unqualified opinion, the highest opinion given by independent auditors. In addition, we received three requests from Congress to provide information, assess FTC activities, and to initiate an investigation.

As in the past, FTC management has been responsive in working with the OIG to resolve all proposed recommendations. I appreciate management's support and look forward to working with management in our ongoing efforts to promote economy and efficiency in agency programs.

Scott E. Wilson

Inspector General

#### INTRODUCTION AND DEFINITIONS

THE MISSION OF THE OFFICE OF INSPECTOR GENERAL IS TO PROMOTE ECONOMY, EFFICIENCY, AND EFFECTIVENESS BY DETECTING AND PREVENTING WASTE, FRAUD, AND ABUSE.

In compliance with the Inspector General Act Amendments of 1988 (5 U.S.C. app.), the Office of Inspector General (OIG) was established in 1989 as an independent and objective organization within the FTC.

Under the Inspector General Act, the OIG is responsible for conducting audits and investigations relating to the programs and operations of the FTC. Audits are conducted for the purpose of finding and preventing fraud, waste and abuse and to promote economy, efficiency and effectiveness within the agency. OIG investigations seek out facts related to allegations of wrongdoing on the part of FTC employees and individuals or entities having contracts with or obtaining benefits from the agency.

Individuals who wish to file a complaint about the business practices of a particular company or entity, or allegations of identity theft, deceptive advertising practices or consumer fraud should file a complaint with the FTC Bureau of Consumer Protection.

Complaints to the OIG from the public or from an FTC employee can be made anonymously. The identity of an FTC employee who reports waste or wrongdoing to the OIG will be protected from disclosure consistent with provisions of the Inspector General Act. In addition, the Inspector General Act and the Whistleblower Protection Act prohibit reprisals against employees for complaining to or cooperating with the OIG.

The OIG is required by law to prepare a semiannual report summarizing the activities of the Office during the immediately preceding six-month period. The report is sent to the FTC Chairman, the President of the Senate, the Speaker of the House and FTC's appropriating and authorizing committees. This dual reporting requirement facilitates and ensures the independence of the Office. The OIG has a budget of \$1,059,000 for fiscal year 2013.

#### WE PERFORM THE FOLLOWING SERVICES:

**ATTESTATIONS** involve examining, reviewing, or applying agreed-upon procedures on a subject matter, or an assertion about a subject matter. Attestations can have a broad range of financial or nonfinancial objectives such as the FTC's compliance with specific laws and regulations, validation of performance against performance measures or reasonableness of cost.

**PERFORMANCE AUDITS** address the efficiency, effectiveness, and economy of the FTC's programs, activities, and functions; provide information to responsible parties to improve public accountability; facilitate oversight and decision making; and initiate corrective actions as needed.

FINANCIAL AUDITS provide an independent assessment of whether financial statements are presented fairly in accordance with generally accepted accounting principles. Reporting on financial audits in accordance with Government Auditing Standards also includes reports on internal control, and compliance with provisions of laws, regulations, and contracts as they relate to financial transactions, systems and processes.

INVESTIGATIONS are conducted based on alleged or suspected fraud, waste, abuse or gross mismanagement, employee and contractor misconduct, and criminal and civil violations of law that have an impact on the FTC's programs and operations. The OIG refers matters to the U.S. Department of Justice whenever the OIG has reasonable grounds to believe there has been a violation of federal criminal law. The OIG also identifies fraud indicators and recommends measures to management to improve the agency's ability to protect itself against fraud and other wrongdoing.



## AUDITS AND RELATED ACTIVITIES

#### **Completed Audits and Reports**

During this period, we issued the FY 2012 financial statement audit report, the related management letter for the financial statement audit report, and the required assessment of FTC's compliance with the Improper Payments Elimination and Recovery Act of 2010 (IPERA).

## Audit of the FTC Financial Statements for FY 2012

Federal law requires that the FTC obtain an annual independent audit of its financial statements, which the OIG oversees. We contracted with the independent public accounting firm of Dembo, Jones, Healy, Pennington & Marshall, P.C. (DJHPM) under a multiyear contract for which the OIG serves as the Contracting Officer's Representative (COR). The oversight of the contractor ensures that the audit complies with generally accepted government auditing standards and meets contract requirements.

The audit was performed in accordance with U.S. generally accepted government auditing standards and OMB audit guidance. For the

16th consecutive year the FTC received an unqualified opinion, the highest opinion given by independent auditors. As a result of the audit of FTC's financial statements for the year ended September 30, 2012, DJHPM found:

- The financial statements were presented fairly, in all material respects, in conformity with U.S. generally accepted accounting principles,
- No material weaknesses in internal control over financial reporting (including safeguarding assets), and no reportable noncompliance with laws and regulations tested.

### Management Letter for FTC Audited Financial Statements FY 2012

In November 2012, we issued the audit opinion on the fiscal year 2012 financial statements of the FTC. Our report also included reports on internal control and our evaluation of the FTC's compliance with provisions of selected laws and regulations for the fiscal year ended September 30, 2012.

The purpose of the management letter is to present issues identified during the audit of FTC's financial statements regarding certain internal controls and accounting procedures and to recommend actions to address these issues. We do not consider them to be material weaknesses or significant deficiencies in relation to FTC's financial statements. Nonetheless, we believe that they warrant management's attention and action.

We made five recommendations for strengthening FTC's internal controls and accounting procedures. In its response, FTC concurred with all our recommendations and described actions it had taken to address each issue. These issues addressed controls in the following areas:

- Capitalization policies and procedures
- Documentation of client controls for its independent service organization
- Recording of obligations
- Understatement of accounts payable, and
- Year-end closing procedures

Management continues it's work on issues identified in prior years, as detailed in Table 1 at the end of this report.

## Improper Payments Elimination and Recovery Act of 2010 (IPERA)

IPERA requires the OIG to assess the FTC's compliance with improper payment requirements. The OIG determined that the FTC is compliant with the requirements of IPERA. The FTC published a Performance Accountability Report (PAR) and conducted a risk assessment to identify any program that constitutes a high risk for improper payments and considers all of its payments to be low risk.

#### **Audit Resolution and Corrective Actions**

At the end of this reporting period, the FTC offices and bureaus continue to make progress in implementing open recommendations. Based on actions taken by FTC management the OIG closed one recommendation. Table 1 shows all recommendations open 180 days or more on which corrective actions are still in progress.

#### Audit and Other Activites Planned or In-Progress

The OIG will initiate two mandatory reviews during the next reporting period that will assess the FTC's financial oversight and information security.

## Audit of the FTC Financial Statements for FY 2013

financial statement audit is required annually under the Accountability of Tax Dollars Act of 2002. We contract with an independent public accountant to perform this work. The OIG serves as the COR and provides oversight on the contract. purpose of the audit is to express an opinion on the financial statements of the FTC for the fiscal year ending September 30, 2013. The audit will also test the internal controls reporting financial and compliance with selected laws regulations. The audited financial statements are included in the financial section of the agency's Performance and Accountability Report to be issued in November 2013.

## Review of FTC FISMA Implementation for FY 2013

FISMA requires an annual evaluation of each agency's information security program and practices to determine their effectiveness. The evaluation is performed by the Inspector General or by an independent external auditor, as determined by the Inspector General.

To assist us in conducting this review, we hire an independent consultant to perform this work. The OIG acts as the COR and performs oversight during the execution of this contract. The review includes evaluating the adequacy of the FTC's information security program and practices for its major systems.

#### Other Potential Reviews

During the next reporting period, we will conduct research and consider further audit work in the following areas:

- The FTC's move to Constitution Center to assess whether planning has been adequate to control overall costs, and specific risks related to information technology transitition issues.
- Review of purchase card programs to identify and analyze the risks of illegal, improper, or erroneous purchases and payments.

## Inspection and Evaluation Activities Planned or In-Progress

The FTC is constantly challenged to manage its limited resources in a manner that will maximize its desired outcome to prevent business practices that are anticompetive or deceptive or unfair to consumers. A complex marketplace, ever evolving fraud schemes, declining budgets, and increasing workloads require continuous reassessment of management practices in achieving that objective.

In 2013, the OIG plans to evaluate policies and procedures for case selection and management with the intent of identifying and rcommending opportunities to further improve the efficiency and effectiveness of FTC programs.

#### **Congressional Requests**

During the period, we received three requests from Congress:

- Unimplemented audit recommendations—
  the Committee on Oversight and Government Reform requested input from IGs on
  outstanding recommendations for reducing
  waste and increasing efficiency in Executive
  Branch agencies. We reported that the FTC
  OIG currently has no unimplemented cost
  savings recommendations.
- Climate change—the Bicameral Task Force on Climate Change requested assistance from IGs in assessing whether the FTC is doing everything it can do to confront the growing threat of climate change. Our assessment is in process and will be completed by the end of May, 2013.
- Press leaks—Chairman Darrell Issa, House Committee on Oversight and Government Reform requested that the OIG investigate whether the FTC Commission, or its staff, has shared nonpublic information with the public or the press about their investigation into whether Google has violated the FTC Act.



#### **INVESTIGATIVE ACTIVITIES**

The Inspector General is authorized by the IG Act to receive and investigate allegations of employee misconduct as well as fraud, waste and abuse occurring within FTC programs and operations. Matters of possible wrongdoing are referred to the OIG in the form of allegations or complaints from a variety of sources, including FTC employees, other government agencies and the general public. Reported incidents of possible fraud, waste and abuse can give rise to administrative, civil or criminal investigations.

#### **Investigative Summary**

During this reporting period, the OIG received 44 consumer complaints and other inquiries and reports of possible wrongdoing. Of the 44 complaints, 24 involved issues that fall under the jurisdiction of FTC program components (identity theft, credit repair, etc.) and not the OIG. These matters were referred to the appropriate FTC component for disposition.

Of the remaining complaints, the OIG opened 3 new investigations and 8 complaints were closed with no further OIG action. Three complaints were referred to other federal agencies with appropriate jurisdiction. The remaining complaints resulted in six preliminary inquiries that required minimal investigative effort; all have been closed.

The following is a summary of the OIG's

investigative activities for the six-month period ending March 31, 2013:

Cases pending as of 10/1/12	6
PLUS: New cases	3
LESS: Cases closed	0
Cases pending as of 3/31/12	9

#### **Lottery Scams**

In addition to the complaints above, the OIG receives complaints from individuals who reported impersonations of FTC staff in relation to lottery and sweepstakes winnings. These complaints are incorporated into an ongoing investigation run by a multi-agency task force in which we participate. For FY 2013, there have been 5 indictments related to the lottery task force. One person was sentenced to 9 years in Federal prison and was ordered to pay \$188,503 in restitution.

#### **Bogus Email**

During this reporting period, we were notified of a suspicious email received by many small business owners. The email purported to be from the FTC advising the businesses of a consumer complaint and threatening to levy a fine against them if they failed to comply with the instructions within the email. The email prompted owners to click on an embedded link in the email. When the link is clicked, malicious code attempts to activate. It was successfully stopped by most anti-virus software. We were able to trace the origin of the email and contact the Internet Service Provider (ISP) who closed the account after learning how it was being used.

#### Matters Referred for Prosecution

During this reporting period the OIG did not refer any new matters to the Department of Justice (DOJ) for consideration of potential criminal action.

#### OIG Outreach

During this reporting period, the OIG instituted an educational outreach program. We visited the FTC's Atlanta, Georgia and Cleveland, Ohio regional offices to introduce the OIG and educate staff members on our mission at the FTC.

#### **OTHER ACTIVITIES**

#### Liaison with Other Agencies

In conducting criminal investigations, OIG has provided support to, sought assistance from and worked jointly with other law enforcement agencies to include the Federal Bureau of Investigation, United States Postal Service OIG, Department of Homeland Security, United States Postal Inspection Service, the Federal Protective Service, the Federal Maritime Commission OIG, the United States Marshal Service, the Internal Revenue Service, the New York State Troopers, the Maricopa County Attorney's Office as well as other local, state and Federal law enforcement agencies.

## Activities within the Inspector General Community

The FTC IG is an active participant in the Council of the Inspectors General on Integrity and Efficiency (CIGIE), a council of inspectors general that promote collaboration on integrity, economy, and efficiency issues that transcend individual agencies. The IG also participates in periodic meetings designed to address issues common to smaller OIGs.

Our IG Counsel participates regularly in the monthly meeting of the Council of Counsels to Inspectors General (CCIG). Additionally, our counsel contributes to the legal discourse within that Council on matters that are relevant to the entire IG community.

Our Lead Investigator is an active participant in the Metro Area Fraud Task Force headed by the Secret Service. This task force is made up of law enforcement professionals in the Washington, DC metro area who work together to identify suspects and solve various crimes.

Our Lead Investigator also assisted the Federal Maritime Commision OIG in an investigation, requested by Congress, related to the use of key logging software.

Our Audit Manager participates regularly in the monthly meeting of the Financial Statements Audit Network (FSAN), a CIGIE subcommittee. She also teaches the financial statement section of the CIGIE Peer Review training offered to the greater OIG community. Additionally she is currently participating in two OIG workgroups: the revision of the GAO/CIGIE Financial Audit Manual, and the review of OMB Bulletin No. 09-33 *Audit Requirements for Federal Financial Statements*.

#### Significant Management Decisions

Section 5(a)(12) of the Inspector General Act requires that if the IG disagrees with any significant management decision, such disagreement must be reported in the semiannual report to Congress. Further, Section 5(a)(11) of the Act requires that any decision by management to change its response to a significant resolved audit finding must also be disclosed in the semiannual report. For this reporting period there were no significant final management decisions made with which the OIG disagreed, and management did not revise any earlier decisions on OIG recommendations.

#### Access to Information

The IG is to be provided with ready access to all agency records, information, or assistance when conducting an investigation or audit. Section 6(b)(2) of the IG Act requires the IG to report to the agency head, without delay, if the IG believes that access to required information, records or assistance has been unreasonably refused, or otherwise has not been provided. A summary of each report submitted to the agency head in compliance with Section 6(b)(2) must be provided in the semiannual report in accordance with Section 5 (a)(5) of the Act. During this reporting period, the OIG did not encounter a problem in obtaining assistance or access to agency records.

#### Review of Legislation

Section 4(a)(2) of the IG Act authorizes the IG to review and comment on proposed legislation or regulations relating to the agency or, upon request, affecting the operations of the OIG. During this reporting period, the OIG reviewed no legislation.

#### **Appendix: Peer Review Activity**

Section 989C of the Dodd-Frank Act contains additional semiannual reporting requirements pertaining to peer review reports. Federal Inspectors General are required to engage in peer review processes related to both their audit and investigative operations. In keeping with Section 989C, the FTC OIG is reporting the following information related to its peer review activities. These activities cover our role as both the reviewed and the reviewing OIG and relate to both audit and investigative peer reviews.

#### **Audit Peer Reviews**

On a 3-year cycle, peer reviews are conducted of an OIG audit organization's system of quality control in accordance with the CIGIE Guide for Conducting External Peer Reviews of the Audit Organizations of Federal Offices of Inspector General. These guidelines are based on requirements in the *Government Auditing Standards*. Federal audit organizations can receive a rating of pass, pass with deficiencies or fail.

- The FTC OIG was the subject of a peer review of its audit organization during the previous period ending September 2012. The U.S. Election Assistance Commission OIG conducted the review and issued its system review report on September 7, 2012. In the U.S. Election Assistance Commission OIG's opinion, the system of quality control for our audit organization in effect for the year ended March 31, 2012, had been suitably designed and complied with to provide our office with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. We received a peer review rating of pass.
- The report's accompanying letter of comment contained two recommendations that, while not affecting the overall opinion, were designed to further strengthen the system of quality control in the FTC OIG audit organization. We agreed with the findings and rec-

commendations and have initiated corrective actions.

The system review report is posted on our Web site at FTC Office of Inspector General.

#### **Investigative Peer Reviews**

OIGs with statutory law enforcement authority pursuant to Section 6(e) of the Inspector General Act are subject to a peer review no less than once every three years. The FTC OIG does not have statutory law enforcement authority. Therefore, our investigative organization is not required to have a peer review. However, the FTC OIG voluntarily participates in the peer review process.

While no peer review was conducted during this reporting period, the FTC OIG investigative operation was the subject of a peer review conducted by the Federal Election Commission (FEC) OIG in 2012. FEC issued its final report to us in March 2012, which opined that our system of internal safeguards and management procedures was in compliance with the quality standards for investigations.

#### Peer Review of CFTC OIG

During this reporting period, the FTC OIG conducted an investigative peer review of the Commodity Futures Trading Commission (CFTC) OIG.

We issued the final report to CFTC OIG in March 2013 opining that it is in compliance with the quality standards for investigations.

#### SIGNIFICANT RECOMMENDATIONS FROM PREVIOUS SEMIANNUAL REPORTS ON WHICH CORRECTIVE ACTIONS HAVE NOT BEEN COMPLETED

The IG Act, Section 5(a)(3), requires an identification of each significant recommendation described in previous semiannual reports for which corrective action had not been completed. This table shows the corrective actions management has agreed to implement but has not completed for recommndations that are open 180 days or more. The information in this table is based on (1) information supplied by FTC's Financial Management Office (FMO), which administers management's audit resolution activities and (2) the OIG's determination of closed recommendations.

Recommendations are closed when (a) FMO notifies the OIG that corrective actions are completed or (b) in the case of recommendations that the OIG determines to be particularly significant, after the OIG confirms that corrective actions have been completed and are responsive.

#### **CLOSED RECOMMENDATIONS**

Report No/Date/ Title	Significant Recommendation	Brief Summary of Planned Corrective Actions	
AR 11-003	Update Administrative Manual for training of	Based on review of documents provided by Management, OIG concurs that Management has	
Follow-up Review of FTC Purchase Card	both cardholders and cardholders' Approving	completed actions that addressed this recommendation.	
January 2011	Officials.	CLOSED	

## TABLE 1: REPORTS WITH RECOMMENDATIONS ON WHICH CORRECTIVE ACTION HAS NOT BEEN COMPLETED

Report No/Date/ Title	Significant Recommendation	Brief Summary of Planned Corrective Actions
AR 09-001A  Financial Statement Management Letter FY 2008  February 2009	Reporting Function in Oracle Needs Improvement	Management continues to work with the service provider on the inability of Oracle Federal Financials version R12 to produce an open invoice listing (aka Accounts Payable Trail Balance). Obtaining a solution is targeted for July 31, 2013. The OIG will validate Management's corrective actions during the financial statement audit for FY 2013.
AR 10-001A  Financial Statement Management Letter FY 2009  May 2010	Close out Procedures on Contracts Need Improvement	FMO will review and enforce its closeout procedures and re-emphasize through outreach and training the role of the COR in timely review and de-obligation of expired contracts. The initial phase of this review is targeted for the end of July 2013.  The OIG will validate Management's corrective actions during the financial statement audit for FY 2013.
AR 11-001A  Financial Statement Management Letter FY 2010  April 2011	Contract Files Lack Documentation	FMO will review and, if necessary, update its standard operating procedures for file documentation and provide training to all acquisition staff to ensure adherence. The initial phase of this review is targeted for the end of June 2013.  The OIG will validate Management's corrective actions during the financial statement audit for FY 2013.
AR 11-001A  Financial Statement Management Letter FY 2010  April 2011	Fraud Risk Assessment Can Enhance FMFIA	FMO will incorporate high fraud risk areas identified through its Fraud Risk Assessments into its annual statement of assurance process.  Completion is targeted for September 30, 2013.  The OIG will validate Management's corrective actions during the financial statement audit for FY 2013.

## TABLE 1: REPORTS WITH RECOMMENDATIONS ON WHICH CORRECTIVE ACTION HAS NOT BEEN COMPLETED (CONTINUED)

Report No/Date/ Title	Significant Recommendation	<b>Brief Summary of Planned Corrective Actions</b>
AR 11-004  Audit of the FTC  Warehouse  April 2011	Evaluate and Install Inventory Software	The Administrative Services Office (ASO), with the assistance of the Office of Chief Information Officer, has been transitioning to its inventory control software system. After completion of testing and training, conversion to a sole inventory management system is expected to be no later that October 1, 2013.  The OIG will validate Management's corrective actions after October 1, 2013.
AR 12-002  Independent Assessment of the FTC Implementation of FISMA for FY 2011  December 2011	To improve FTC security and privacy programs and bring them current with OMB and NIST guidance, 11 recommendations for improvement were made in the areas of risk management, capital planning and the information security continuous monitoring program.	Management concurred with the recommendations and is either in the process of implementing or has implemented actions to address the recommendations.  The OIG will validate Management's corrective actions during the next Semiannual reporting period.

TABLE 2: INSPECTOR GENERAL ISSUED REPORTS WITH QUESTIONED COSTS

			Dollar Value	
		Number	Questioned Costs	Unsupported Costs
A.	For which no management decision has been made by the commencement of the reporting period	0	0	0
В.	Which were issued during the reporting period	0	0	0
	Subtotals (A+B)	0	0	0
C.	For which a management decision was made during the reporting period	0	0	0
	(i) dollar value of the disallowed costs	0	0	0
	(ii) dollar value of the cost not disallowed	0	0	0
D.	For which no management decision was made by the end of the reporting period	0	0	0

## TABLE 3: INSPECTOR GENERAL ISSUED REPORTS WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE

		Number	Dollar Value
<b>A.</b>	For which no management decision has been made by the commencement of the reporting period	0	0
В	Which were issued during this reporting period	0	0
C.	For which a management decision was made during the reporting period	0	0
	(i) dollar value of recommendations that were agreed to by management	0	0
	- based on proposed management actions	0	0
	- based on proposed legislative action	0	0
	(ii) dollar value of recommendations that were not agreed to by management	0	0
D.	For which no management decision has been made by the end of the reporting period	0	0

## TABLE 4: SUMMARY OF INSPECTOR GENERAL REPORTING REQUIREMENTS

IG ACT Reference	Reporting Requirement	Page(s)
Section 4(a)(2)	Review of legislation and regulations	9
Section 5(a)(l)	Significant problems, abuses and deficiencies	4-5
Section 5(a)(2)	Recommendations with respect to significant problems, abuses and deficiencies	4-5
Section 5(a)(3)	Prior significant recommendations on which corrective actions have not been made	12-13
Section 5(a)(4)	Matters referred to prosecutive authorities	7
Section 5(a)(5)	Summary of instances where information was refused	9
Section 5(a)(6)	List of audit reports by subject matter, showing dollar value of questioned costs and funds put to better use	14-15
Section 5(a)(7)	Summary of each particularly significant report	4-7
Section 5(a)(8)	Statistical tables showing number of reports and dollar value of questioned costs	14
Section 5(a)(9)	Statistical tables showing number of reports and dollar value of recommendations that funds be put to better use	15
Section 5(a)(10)	Summary of each audit issued before this reporting period for which no management decision was made by the end of the reporting period	N/A
Section 5(a)(11)	Significant revised management decisions	8
Section 5(a)(12)	Significant management decisions with which the inspector general disagrees	8

HELP PROMOTE INTEGRITY, ECONOMY AND EFFICIENCY

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600 PENNSYLVANIA AVENUE, NW NJ-1110
WASHINGTON, D.C. 20580

HOTLINE: (202) 326-2800 FAX: (202) 326-2034 EMAIL: OIG@FTC.GOV

ANY INFORMATION YOU PROVIDE WILL BE HELD IN CONFIDENCE.

HOWEVER, PROVIDING YOUR NAME AND MEANS OF COMMUNICATING WITH YOU

MAY ENHANCE OUR ABILITY TO INVESTIGATE.

# The FTC's Office of the Inspector General

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