



NCUA
National Credit Union Administration

2026

Office of Inspector General
Annual Work Plan





OVERVIEW

The National Credit Union Administration (NCUA) Office of Inspector General (OIG) Annual Work Plan (Plan) for 2026 describes audits and other work that would most benefit the NCUA's mission. In formulating this Plan, we considered:

- The NCUA's Strategic Plan and Annual Performance Plan;
- Pertinent legislation, including the Federal Credit Union Act (FCU Act), the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), the Government Performance Results Act, the Chief Financial Officers Act of 1990, the Federal Information Security Modernization Act of 2014 (FISMA), the Sarbanes-Oxley Act, the Privacy Act, the Government Charge Card Abuse Prevention Act of 2012, and the Inspector General Act;
- Congressional activity and testimony by NCUA officials, as well as areas of significant interest to the NCUA Board and the Congress;
- Audits planned and performed by the U.S. Government Accountability Office (GAO);
- Input obtained from the NCUA Board and executive staff;
- Complaints received and investigations conducted in prior years;
- Request(s) from the Council of Inspectors General on Financial Oversight; and
- The credit union industry's operating environment.

How We Created the Annual Work Plan

The NCUA OIG plans its work to identify and respond to issues that are of greatest importance to the NCUA's mission and related goals. For purposes of the Plan, we identified prospective audit work that is responsive to the agency's strategic goals (see table below).



THE NCUA’S STRATEGIC GOALS¹

STRATEGIC GOAL 1:

Ensure a safe, sound, and viable system of cooperative credit that protects consumers.

STRATEGIC GOAL 2:

Improve the financial well-being of individuals and communities through access to affordable and equitable financial products and services.

STRATEGIC GOAL 3:

Maximize organizational performance to enable mission success.

In preparing our 2026 Annual Work Plan, we considered that we did not perform a material loss review (MLR) in 2025. The FCU Act, as amended by the Dodd-Frank Act, requires the OIG to conduct an MLR of an insured credit union if the loss to the Share Insurance Fund (SIF) exceeds \$25 million and an amount equal to 10 percent of the total assets of the credit union at the time in which the NCUA Board initiated assistance or was appointed liquidating agent pursuant to the FCU Act. In addition, for any loss to the SIF that does not meet this threshold, the FCU Act requires the OIG to conduct a limited-scope review to determine whether unusual circumstances exist related to the loss that would warrant conducting a full-scope MLR.

In addition to MLRs and other mandatory audits, we considered discretionary audit proposals identified by our staff and selected those audits we would perform in the coming year (see Appendix C). We selected those audit proposals we considered most significant to the NCUA’s mission and the interests of the NCUA Board and the Congress.

¹ Source: NCUA Strategic Plan 2022–2026.



RESOURCES

The OIG has 10 full-time authorized positions, including the Inspector General, the Deputy Inspector General, who functions as the Assistant Inspector General for Audits, the Counsel to the Inspector General/Assistant Inspector General for Investigations, four senior auditor positions, a senior information technology auditor, the Director of Investigations, and an office manager. After departures of the Inspector General, Deputy Inspector General, and a senior auditor earlier this year, the OIG had seven employees, with the Counsel to the Inspector General/Assistant Inspector General for Investigations acting as Inspector General and the senior information technology auditor acting as Deputy Inspector General.

The OIG uses contractors for the annual financial statement audits and the annual FISMA evaluation and may contract for other short-term projects. The OIG's 2026 contracting budget for audits is approximately \$900,000.

We may defer audits that we cannot accomplish in 2026 to 2027, or may decide to perform an audit listed in 2027 in 2026.

This 2026 Annual Work Plan includes the following appendices:

- Appendix A: Planned Audits
- Appendix B: Legal Projects and Investigative Work
- Appendix C: Summary of Planned Audits



APPENDIX A: PLANNED AUDITS

Carryover Audits from 2025 to 2026

Audit of the NCUA’s Duty Station and Locality Pay Assignment

NCUA employees work in the NCUA’s headquarters or at various locations in its regions. An employee’s official duty station and associated locality pay are listed on their SF-50. For field employees, the official duty station is the geographic limits of the official duty station designated on the SF-50. Field employees are considered mobile workers whose work is characterized by routine and regular travel to conduct work as opposed to a single authorized worksite. In addition to affecting locality pay, a field employee’s official duty station affects travel reimbursement.

On August 9, 2023, NCUA management issued a memorandum and job aid titled “Field Staff Travel Time and Reimbursement Related to the Assigned Official Duty Station” to provide additional clarification regarding the NCUA’s travel and commuting policies for field employees, including that field employees are generally expected to live in their official duty station or within reasonable proximity to the official duty station. Management issued this memorandum and job aid because a field employee’s residence affects travel reimbursement if they live more than 40 miles from their official duty station and to make clear that an employee’s residence is where they live and receive mail daily, and that vacation homes, other family residences, and post office boxes not associated with a physical address were not acceptable alternatives.

Objective: Determine whether the NCUA consistently followed laws, regulations, policies, and procedures in the assignment of field employees’ official duty station, locality pay, and reimbursement for travel.

Audit of the NCUA’s Enterprise Risk Management (ERM)

OMB Circular A-123 provides that ERM is an agency-wide approach to addressing the full spectrum of the agency’s external and internal risks by understanding the combined impact of risks as an interrelated portfolio, rather than addressing risks only within silos. ERM provides an enterprise-wide, strategically aligned portfolio view of organizational challenges that provides better insight into how to most effectively prioritize resource allocations to ensure successful mission delivery. While agencies cannot respond to all risks related to achieving strategic objectives and performance goals, they must identify, measure, and assess risks related to mission delivery.

The NCUA is exposed to a variety of risks related to its mission and operations, including in its regulation and supervision of over 4,000 federally insured credit unions. Through its ERM program, the agency expects to manage risks to achieving its mission and maximizing opportunities. ERM should address the full spectrum of risks related to achieving the NCUA’s strategic objectives and provide agency leadership a complete view of risk to help inform decision making.



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Objective: Determine whether the NCUA adequately established, maintained, and used risk profiles to address enterprise-level risks.

Audit of the NCUA's Travel Card Program

The Travel and Transportation Reform Act of 1998 (Public Law 105-264) mandates that federal employees use the government travel charge card for all payments of expenses related to official government travel, unless exempted by the employing agency or the General Services Administration (GSA). The GSA provides charge card services to the entire federal government under a contract, currently the SmartPay 3 contract.

The Government Charge Card Abuse Prevention Act of 2012 requires agency officials to establish and maintain internal controls to ensure the proper use of travel charge cards. In addition, the Act requires that the agency's OIG perform periodic analyses or audits, as necessary, of travel card transactions designed to identify potentially illegal, improper, or erroneous uses of travel cards, and any patterns of such uses. OMB Circular A-123, Appendix B establishes standard minimum requirements and best practices for government charge card programs that may be supplemented by individual agency policies and procedures. The NCUA requires employees' use of travel cards to comply with its travel program policies, the Travel Card Manual, and Public Law 105-264.

Objective: Determine whether the NCUA's travel card policies and procedures were effective in preventing and detecting illegal, improper, or erroneous purchases and payments.

Financial Statement Audits (4) for the Year Ending December 31, 2025

The OIG will conduct an audit of the NCUA's financial statements for its four funds for the year ending December 31, 2025: the National Credit Union Share Insurance Fund (SIF), the Operating Fund (OF), the Central Liquidity Facility (CLF), and the Community Development Revolving Loan Fund (CDRLF). We contract with an independent public accounting firm to conduct this audit. We issue the audit report within 45 days of NCUA's calendar year-end.

Objectives: Determine whether the four funds the NCUA administers comply with U.S. generally accepted accounting principles (GAAP) and whether the NCUA's statements present fairly, in all material respects, the financial position, results of operations, and changes in cash flows.



New Starts - Mandatory Audits for 2026

Material Loss Reviews (MLRs) (as necessary)

The FCU Act, as amended by the Dodd-Frank Act, requires the OIG to review and report on any credit union material losses to the Share Insurance Fund exceeding \$25 million and 10 percent of the assets of the failed credit union at the time in which the NCUA Board initiated assistance or was appointed liquidating agent pursuant to the FCU Act. In addition, the FCU Act requires the OIG to conduct a limited review of all non-material losses to the Share Insurance Fund and elevate them to an MLR if they present unusual circumstances.

Objectives: (1) Determine the cause(s) of the credit union's failure and the resulting loss to the Share Insurance Fund; (2) assess the NCUA's supervision of the credit union, including implementation of the prompt corrective action requirements of Section 216 of the FCU Act; and (3) make appropriate observations and/or recommendations to prevent future losses.

Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act)

The Charge Card Act requires all agencies to establish and maintain safeguards and internal controls for charge cards. The Charge Card Act also establishes the OIG's risk assessment, audit, and reporting requirements.

Objective: Identify and analyze the risks of illegal, improper, or erroneous charge card purchases and payments and provide and report recommendations, if warranted, to agency management, the Director of the Office of Management and Budget (OMB), and the Congress.

Federal Information Security Modernization Act of 2014 (FISMA)

FISMA requires each agency to develop, document, and implement an agency-wide program to provide information security for the systems that support the operations and assets of the agency. FISMA includes a requirement that an OIG perform an annual evaluation of the agency's program. We will contract with an independent public accounting firm to conduct this evaluation. The evaluation includes testing the effectiveness of information security policies, procedures, and practices of a representative subset of the agency's information systems, and assessing the effectiveness of the information security policies, procedures, and practices of the agency. The evaluation also assesses the NCUA's privacy program.

Objective: Determine whether the NCUA information security and privacy management policies and procedures comply with FISMA and related federal regulations and standards.

Audit of the NCUA's Financial Statement Line Items and Related Note Disclosures Material to the *Financial Report of the U.S. Government*

The OIG will provide audit assurance for the NCUA's financial statement line items and related note disclosures identified by the U.S. Department of Treasury as material to the *Financial Report of the U.S. Government*. We will contract with an independent public accounting firm to



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conduct this audit and provide the resulting audit report to the U.S. Department of Treasury and the GAO for their use in preparing and auditing the *Financial Report of the U.S. Government*.

Objective: Determine whether the NCUA's financial statement line items and related note disclosures identified by the U.S. Department of the Treasury as material to the *Financial Report of the U.S. Government*, are presented fairly, in all material respects, in accordance with GAAP for the period under review.

Financial Statement Audits (4) for the Year Ending December 31, 2026

We will contract with an independent public accounting firm to conduct an audit of the NCUA's financial statements for its four funds for the year ending December 31, 2026: the Share Insurance Fund, the Operating Fund, the Central Liquidity Facility, and the Community Development Revolving Loan Fund. We will issue the audit report within 45 days of NCUA's calendar year-end.

Objective: Determine whether the NCUA's financial statements for its four permanent funds comply with GAAP and present fairly, in all material respects, the agency's financial position, results of operations, and changes in cash flows for the period under review.

Congressional/NCUA Board Requests (as necessary)

Objective: Conduct OIG audits, investigations, or other work in response to requests from the Congress or the NCUA Board.



Potential New Starts for 2026 (Discretionary Audits)

Artificial Intelligence (AI) Implementation

Executive Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government*, recognized the broad applicability of AI to be used by agencies to improve operations, processes, and procedures, meet strategic goals, reduce costs, enhance oversight of the use of taxpayer funds, increase safety, train workforces, and support decision making. Agencies are encouraged to use AI but to also use AI appropriately to foster and maintain public trust and confidence.

On June 30, 2021, GAO developed an AI accountability framework (GAO-21-519SP) to help managers ensure accountability and responsible use of AI in government programs and processes. This framework is organized around four complementary principles, which address governance, data, performance, and monitoring. For each principle, the framework describes key practices for federal agencies and other entities that are considering, selecting, and implementing AI systems.

Office of Management and Budget (OMB) Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*, implements Executive Order 14179, *Removing Barriers to American Leadership in Artificial Intelligence*. The memorandum addressed expectations to federal agencies (including independent regulatory agencies) to remove barriers to innovation, accelerate responsible AI adoption, and ensure the use of AI to serve the American public.

NCUA's Artificial Intelligence Compliance Plan outlines the NCUA's approach to managing the use of artificial intelligence (AI), as required by the AI in Government Act of 2020 and Office of Management and Budget Memorandum M-25-21.

Objective: Determine whether NCUA's efforts to implement AI ensure accountability, operational efficiency, and responsible use were in accordance with federal guidance.

Contract Closeout Process

Effective contract administration is essential for ensuring the NCUA's procurement needs are met in a cost-effective and timely manner and that all the requirements of a contract are fulfilled. Contract closeout is the final stage of the government contracting process. It begins when the contract's requirements have been satisfied and finishes when final payment is made, any disputes are settled, and any required administrative actions are accomplished. The contract closeout process ensures that goods and services are provided as intended, validates final costs and payments, and frees up excess funds. Timely and effective closeout ultimately protects the NCUA's interests and helps the agency to efficiently manage residual contract funds.

Objective: Determine the effectiveness of controls over the NCUA's contract closeout process.



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Insider Threat and Counterintelligence Program

NCUA Instruction 9904 (Rev. 2) established policy for the NCUA Insider Threat and Counterintelligence Program (ITCIP) to ensure the agency met its responsibilities as a federal agency to detect, deter, prevent, and mitigate threats posed by insiders or external adversaries, including foreign intelligence entities. As a federal executive agency, the NCUA is subject to Executive Order 13587, *Structural Reforms to Improve the Security of Classified Networks and the Responsible Sharing and Safeguarding of Classified Information*; Executive Order 13526, *Classified National Security Information*; Executive Order 12333, *United States Intelligence Activities*; and Presidential Memorandum, *National Insider Threat Policy and Minimum Standards for Executive Branch Insider Threat Programs*.

Objective: Determine whether the NCUA's ITCIP operated in accordance with NCUA Instruction 9904 (Rev. 2) and other requirements.

Modern Examination and Risk Identification Tool

The Modern Examination and Risk Identification Tool (MERIT) is the NCUA's examination platform that replaced AIRES, the prior examination platform. It is intended to streamline the examination process and provide examination information related to specific credit unions, examiner surveys (document requests) and credit union responses, other secure communication between examiners and credit unions, a history of completed examination reports, and a financial analytics tool for examiners. NCUA and state supervisory authority examiners can work jointly on examinations in MERIT.

The NCUA's Enterprise Solution Modernization (ESM) Program was initiated in 2015. The program's purpose was to modernize NCUA's technology solutions to create an integrated examination and data environment to facilitate a safe and sound credit union system. As part of the ESM initiative, the Examination and Supervision Solution & Infrastructure Hosting (ESS&IH) project included replacing AIRES with MERIT. MERIT is a web-based application with business intelligence analytics and data integration that uses a commercial-off-the-shelf Governance, Risk, and Compliance (GRC) software application.

Objective: Determine whether MERIT adequately met NCUA requirements for examinations.

Offboarding Process

Offboarding is a process by which an organization formally separates an employee due to an employee's resignation, termination, or retirement. Offboarding a contractor may also involve similar processes and steps. Prior to departure from the NCUA, employees and contractors must complete an offboarding process that involves returning agency property and records and deactivating badges and system accesses, among other things. The offboarding process serves to mitigate reputational, financial, and security risks to the agency.

Objective: Determine whether the agency's controls over the offboarding process effectively mitigated reputational and security risks.



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Ransomware Readiness

According to the Cybersecurity & Infrastructure Security Agency (CISA), ransomware is an ever-evolving form of malware designed to encrypt files on a device to render any files and systems that rely on them unusable. The number and impact of ransomware incidents has made ransomware a significant risk in today's cybersecurity landscape. The goal of most ransomware incidents is to halt processes, interrupt services, and cause disruption until a ransom payment is made in exchange for decrypting files and systems. Ransomware can severely impact business processes and leave organizations without the data they need to operate or deliver mission-critical services. The organizations affected often experience reputational damage, significant remediation costs, and interruptions in their ability to deliver core services.

Objective: Determine the adequacy of the NCUA's process to respond to a ransomware incident.

Travel Relocation Expenses

The Federal Travel Regulations (41 C.F.R. Part 302) allow for reimbursement of expenses for employee relocation that is in the government's interest. It is NCUA's policy to authorize payment of relocation expenses in the following instances: (1) management-directed reassignments, (2) employees who relocate for a position in the central office or a regional office building, (3) promotions to a field or remote position (not reassignments) when the duty station location is open to all duty station locations in the region or contiguous states, (4) reassignment between Supervisory Examiner, Director of Special Actions, and Director of Supervision positions, or (5) the agency issues a notice of interest to fill a permanent position and selects someone who is required to relocate. In addition, the NCUA's relocation program requires the relocation must be from one duty station to another for permanent duty, with the new duty station meeting the 50-mile distance test. An NCUA employee who voluntarily changes his or her official duty station for personal convenience, even if allowed by the agency, is not eligible to participate in the relocation program.

Objective: Determine whether the NCUA processed reimbursements for employee relocation expenses in accordance with Federal Travel Regulations, NCUA Instructions, and NCUA policies and procedures, including the Non-Bargaining Unit Travel Manual and the Collective Bargaining Agreement.

Virtual Examination Program

In 2017, the NCUA Board approved the virtual examination program initiative to research methods to conduct as many aspects of the examination and supervision processes as possible offsite. Key activities of the project to date include developed and implemented initial offsite procedures and guidance based on the flexible examination pilot results, many of which were used during the agency's COVID-19 offsite posture, and catalogued examination scope steps, which included a breakdown of the purpose of each examination step, explained how examiners complete the scope step and the requirements for completing that step, determined whether the examination step could be performed offsite, and additional comments either highlighting non-



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standard details of each examination step or noting aspects of examination steps that needed further review.

Objective: Determine whether the virtual examination program has reduced the burden on credit unions, improved supervision capabilities, provided more consistency and standardized the examination and supervision process.



Mandatory New Starts for 2027

Material Loss Reviews (as necessary)

Objectives: (1) Determine the cause(s) of the credit union's failure and the resulting loss to the SIF, (2) assess the NCUA's supervision of the institution, including implementation of the prompt corrective action requirements of Section 216 of the FCU Act, and (3) make appropriate observations and/or recommendations to prevent future losses.

Government Charge Card Abuse Prevention Act (Charge Card Act) of 2012

Objective: Review the NCUA's purchase and travel card programs to analyze risks of illegal, improper, or erroneous purchases and payments and provide and report recommendations, if warranted, to agency management, the Director of the OMB, and the Congress.

Federal Information Security Modernization Act of 2014

Objective: Determine whether the NCUA information security and privacy management policies and procedures comply with FISMA and federal regulations and standards.

NCUA's Financial Statement Line Items and Related Note Disclosures Material to the *Financial Report of the U.S. Government*

Objective: Determine whether the NCUA's financial statement line items and related note disclosures identified by the U.S. Department of the Treasury as material to the *Financial Report of the U.S. Government* are presented fairly, in all material respects, in accordance with GAAP for the period under review.

Financial Statement Audits (4) for the Year Ending December 31, 2027

Objectives: Determine whether the financial statements for the NCUA's four permanent funds comply with GAAP and present fairly, in all material respects, the agency's financial position, results of operations, and changes in cash flows for the period under review.

Congressional/NCUA Board Requests (as necessary)

Objective: Conduct OIG audits, investigations, or other work in response to requests received from the Congress or the NCUA Board.



Potential Discretionary New Starts for 2027²

Asset Management and Assistance Center (AMAC) Non-Share Payments

Objective: Determine whether the NCUA properly and accurately paid non-share payments.

Community Development Revolving Loan Fund (CDRLF)

Objective: Determine whether CDRLF awardees met program eligibility requirements and whether the NCUA disbursed grant and loan funds in accordance with program guidelines.

Electronic Records Management

Objective: Assess the NCUA's actions to create, retain, and manage records in electronic formats consistent with OMB Memorandum M-23-07 and related NARA regulations and guidance.

Enterprise Data Program (EDP)

Objective: Determine whether the NCUA's EDP improved data quality in operations, reporting, and analytics and used defined data use standards to meet the agency's objectives.

Examination of Corporate Credit Unions

Objective: Determine whether the NCUA's examination of corporate credit unions adequately assessed the corporate credit union's ability to effectively provide services to other credit unions.

Information Security Examination (ISE) Program

Objective: Determine whether the NCUA's ISE program adequately assessed credit unions' information security and cybersecurity programs.

Insured Share Payments and Unclaimed Deposits

Objective: Determine whether the NCUA properly and timely paid share accounts to members when credit unions were liquidated and appropriately handled unclaimed deposits.

Management of Mobile Devices and Services

Objective: Determine if NCUA managed costs associated with NCUA-issued mobile devices and safeguarded NCUA information accessed, stored, or processed on mobile devices with access to the agency's network.

Principal Examiner Certification Program

Objective: Determine whether the NCUA followed policies, procedures, and the collective bargaining agreement in the administration of the program.

Privacy Program

Objective: Determine whether the NCUA implemented its privacy and data protection program in accordance with federal privacy laws, regulations, standards, and policies.

²Based on various factors, the OIG could decide to move a 2027 potential audit to 2026.



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Strategies Related to Crypto-Asset Risk

Objective: Determine whether the NCUA has developed and implemented strategies that address the risks posed by crypto assets.

Student Loan Repayment Program

Objective: Determine whether the NCUA student loan repayment program facilitated the recruitment and retention of highly qualified professional employees.

Temporary Hardship

Objective: Determine whether staff participation in the temporary hardship program was limited to the time constraints specified in the collective bargaining agreement.

Travel Bonus Disbursement Process

Objective: Determine whether the NCUA ensured employees' travel was efficient and no improper payments of travel bonuses were disbursed.

Trusted Workforce 2.0 Process

Objective: Determine whether the NCUA's policies and procedures complied with laws and regulations to reform the personnel vetting process.



APPENDIX B: LEGAL PROJECTS AND INVESTIGATIVE WORK

2026 Legal Activities

- General legal support
- Administrative/personnel legal work
- Investigative assistance and support
- Audit assistance and support
- Legislation/regulation review
- Freedom of Information Act responses

2026 Investigations

- Investigations into NCUA employees and contractors resulting from complaints/referrals
- Proactive reviews and/or investigations
- Coordination with other law enforcement and the NCUA on credit union-related complaints

2026 Training

- Briefings on OIG authorities and responsibilities as needed to supplement online training



APPENDIX C: SUMMARY OF PLANNED AUDITS

2026 Audit Projects

Carryover Audits from 2025 to 2026

- Audit of the NCUA's Duty Station and Locality Pay Assignment
- Audit of the NCUA's Enterprise Risk Management
- Audit of the NCUA's Travel Card Program
- Financial Statement Audits (4) for the Year Ending December 31, 2025

New Starts for 2026 – Mandatory Audits

- Material Loss Reviews (as necessary)
- Government Charge Card Abuse Prevention Act of 2012
- Federal Information Security Modernization Act of 2014
- NCUA's Financial Statement Line Items and Related Note Disclosures Material to the *Financial Report of the U.S. Government*
- Financial Statement Audits (4) for the Year Ending December 31, 2026
- Congressional/NCUA Board Requests (as necessary)

Potential New Starts for 2026 – (Discretionary Audits)

- Artificial Intelligence Implementation
- Certified Public Accountant (CPA) Audits or Independent Agreed-Upon Procedures Engagement for Credit Unions
- Contract Closeout Process
- Insider Threat and Counterintelligence Program
- Modern Examination and Risk Examination Tool
- Offboarding Process



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- Ransomware Readiness
- Travel Relocation Expenses
- Virtual Examination Program

2027 Projects

Audits – Mandatory and Discretionary

- Material Loss Reviews (MLRs) (as necessary)
- Government Charge Card Abuse Prevention Act (Charge Card Act) of 2012
- Federal Information Security Modernization Act of 2014
- Audit of the NCUA's Financial Statement Line Items and Related Note Disclosures Material to the *Financial Report of the U.S. Government*
- Financial Statement Audits (4) for the Year Ending December 31, 2025
- Congressional/NCUA Board Requests (as necessary)
- Asset Management and Assistance Center (AMAC) Non-Share Payments
- Community Development Revolving Loan Fund
- Electronic Records Management
- Enterprise Data Program
- Examination of Corporate Credit Unions
- Information Security Examination (ISE) Program
- Insured Share Payments and Unclaimed Deposits
- Management of Mobile Devices and Services
- Principal Examiner Certification Program
- Privacy Program
- Strategies Related to Crypto-Asset Risk
- Student Loan Repayment Program



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- Temporary Hardship
- Travel Bonus Disbursement Process
- Trusted Workforce 2.0 Process