

**Farm Credit Administration
Office of Inspector General**

Audit Report

Farm Credit Administration's Examiner Staffing Program

A-22-03

January 30, 2023

FCAOIG

Farm Credit Administration
Office of Inspector General



January 30, 2023

The Honorable Vincent G. Logan, Board Chairman and Chief Executive Officer
The Honorable Jeffery S. Hall, Board Member
The Honorable Glen R. Smith, Board Member
Farm Credit Administration
1501 Farm Credit Drive
McLean, Virginia 22102-5090

Dear Chairman Logan and Board Members Hall and Smith:

The Office of Inspector General completed an audit of the Farm Credit Administration's (FCA or Agency) examiner staffing program. The objective of the audit was to evaluate FCA's examination staffing processes. We found that FCA developed and implemented processes to strengthen examiner staffing. The Agency allocated resources to examiner recruiting efforts and established recruiting programs for entry-level examiners. The Agency also implemented a variety of tools and processes to staff examination projects.

We identified opportunities to improve examiner staffing processes. Specifically, we identified improvements needed in collecting recruiting information, analyzing recruiting efforts, and securing data collected on potential employees. We also identified opportunities to improve documentation of examiner rotation policies and scheduling. Lastly, we noted concerns with the collection and storage of data on former employees.

As part of our audit, we conducted a survey to better understand examiner recruiting and staffing efforts and gather examination staff feedback. The survey contained 13 questions and was completed by 91 of the 97 recipients. While we understand there are many variables that impact survey responses, we think this feedback is useful to better understand and plan Agency efforts in these areas.

We made seven recommendations to improve examiner staffing. FCA management agreed with the recommendations and provided corrective actions that were responsive to our recommendations. Because of the actions initiated by the Office of Examination during the audit, we consider recommendation 4 closed.

We appreciate the courtesies and professionalism extended by FCA to our staff during the audit. If you have any questions about this audit, we would be pleased to meet with you at your convenience.

Respectfully,

A handwritten signature in black ink that reads "Sonya K. Cerne". The signature is written in a cursive style.

Sonya K. Cerne
Assistant Inspector General for Audits, Inspections, and Evaluations

EXECUTIVE SUMMARY

Farm Credit Administration's Examiner Staffing Program

Report No. A-22-03

January 30, 2023

Objective

The objective of this audit was to evaluate FCA's examination staffing processes.

Scope

Staffing processes include the recruiting, scheduling, rotating, and retention of FCA examiners.

Recommendations

The Office of Inspector General made seven recommendations to the Office of Examination to strengthen the Agency's examiner staffing program. The recommendations focused on improving examiner recruiting efforts, documenting the Agency's examiner rotation policies and procedures, and strengthening controls for the collection and storage of data on potential and former employees.

Agency Response

Management agreed with, and provided corrective actions for, all recommendations. Because of the actions initiated during the audit, we consider recommendation 4 closed.

Why We did This Audit

The Farm Credit Administration (FCA) has an important mission to uphold in ensuring that all Farm Credit System institutions are safe, sound, and dependable sources of credit and related services. The FCA Board directs the maintenance of a risk-based approach to oversight and examination, and the Office of Examination (OE) must maintain staff resources to fulfill the Agency's mission. Because examiners are an essential link with System institutions through examination and oversight, it is imperative for the Agency to have a trained and developed examination talent pool to perform the work. We performed this audit to evaluate FCA's actions for recruiting and staffing.

How We Did This Audit

We reviewed FCA's recruiting schedules, budget documentation, time code data, and other information to determine processes implemented for, and resources expended on, recruiting efforts. We reviewed OE's planning process, scheduling tool, and attrition database for information on staffing, scheduling, and rotation of examination staff. We compared examiner-in-charge assignments for the last three examination cycles and reviewed assignment information. We also issued a survey to current examination staff that were hired by FCA within the last ten years.

What We Found

The Agency has established, devoted resources to, and budgeted for, an examiner recruiting program. The Agency also implemented a variety of tools and processes to staff examination projects and had systems in place for scheduling, rotating, and analyzing FCA examination staff.

However, we identified improvements needed in collecting data on recruiting, analyzing recruiting efforts, and increasing security over certain information collected on potential employees. We also noted opportunities for OE to update and document certain policies and procedures on scheduling and rotating examination staff and noted concerns with the collection and storage of data on former employees.

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BACKGROUND

Farm Credit Administration

The Farm Credit Administration (FCA or Agency) is an independent federal agency responsible for regulating, examining, and supervising the Farm Credit System (System). The Agency is responsible for ensuring that all System institutions are safe, sound, and dependable sources of credit and related services for all creditworthy and eligible persons in agriculture and rural America.

Office of Examination

FCA's Office of Examination (OE) is responsible for examining and supervising System institutions in accordance with the Farm Credit Act of 1971, as amended, and applicable regulations. OE has oversight responsibility for the System's 60 agricultural credit associations, 4 banks, 1 federal land credit association, and 6 service corporations.¹ As noted in FCA's Board Policy Statement 53, *Examination Philosophy*, the FCA Board directs the maintenance of a risk-based approach to oversight and examination, and OE must maintain staff resources to fulfill the Agency's mission. Examiners are an essential link with System institutions through ongoing institution oversight, examinations, meetings with boards and management, and reports and correspondence.

OE is divided into the following divisions:

- Association Examination Division – East
- Association Examination Division – West
- Bank Examination Division
- Staff Development Division (SDD)
- Examination Guidance Division
- Risk Supervision Division

OE accounts for about half of the total Agency personnel. OE personnel are assigned to the five FCA locations and a few are assigned to permanent flexiplace. Over the last four years, on average, OE planned to hire 17 examination staff per year and actually hired about 19 per year. For the same period, OE lost, on average, about 21 staff each year through attrition, including retirements. Currently, OE identifies about 15 percent of its workforce as retirement eligible through the end of fiscal year (FY) 2022.

Examination Program

FCA Board Policy Statement 53, *Examination Philosophy*, provides that the examination program must maintain adequately trained examiners who understand the unique risks and opportunities of agriculture; an appropriate number of examiners with regulatory and financial industry experience and skills; and examination staff that can communicate and work effectively with

¹ As of January 1, 2023.

System institutions to ensure the institutions remain safe and sound and able to fulfill their public policy purpose.

To fill examination positions, OE has established a recruiting program. Within OE, SDD has primary responsibility for recruiting efforts. Specifically, SDD develops recruiting strategies, schedules recruiting events, and identifies staff to participate in recruiting activities. Recruiting events primarily consist of campus events and career fairs, and recruiters are tasked with educating potential candidates about the Agency and ensuring that the candidates know where to find FCA job announcements.

Once recruiting and hiring has been completed, examination staff generally enter the commissioning program. A commission is a designation that is obtained after achievement and demonstration of OE-required competencies and successful performance on the commissioning test. Associate examiners spend multiple years in the commissioning program completing coursework, working on examinations, and taking evaluations. Associate examiners are assigned to SDD until they are promoted to another examination division for further development. OE also has processes to commission mid-career hires with experience gained from work outside of FCA. FCA hires non-commissioned mid-career examiners that may go through the commissioning program. FCA also hires commissioned mid-career examiners from other regulatory agencies and grants them an FCA commission after confirming their ability to lead FCA examinations. As of October 2022, OE identified 173 employees in the office, 85 of whom were commissioned examiners.

Assignment Processes

OE assignment processes are designed to ensure that the right resources are utilized to complete oversight work. Key assignments for examinations include the examiner-in-charge (EIC) and reviewing official. OE tracks and monitors various factors for these assignments, including the number of examination cycles in the position; number of assigned institutions; time zone differences between the staff and institution; and supervision level of assigned institutions. Regular planning meetings are conducted to assess staff assignments and review priorities and risks.

Once key positions are assigned, examinations are staffed with needed resources. In 2019, the Office of Information Technology (OIT) developed a web-based scheduling tool for OE to provide real-time information about staffing availability. The tool allows schedulers to view and sort by institution, person, position, and other factors to identify and schedule appropriate resources. The web-based tool also incorporates approvals and notifications to quickly identify the status of staffing assignments. OE prioritizes examination activities based on statutory compliance dates and institution risk in determining the order in which staff are scheduled.

To support effective oversight, OE rotates certain examination staff. This process supports examiner independence and the Agency's role as an arm's-length regulator. OE's general process is to rotate the EIC at least every three examination cycles. By statute, each institution must be examined by FCA no less than once during each 18-month period. Officials stated that reviewing

officials are also rotated but may be assigned to an institution for more than three examination cycles to support continuity and streamline oversight.

Prior Office of Inspector General Reports

The FCA Office of Inspector General (OIG) issued previous reports relating to examination staffing processes.

- FCA OIG completed an audit, **Farm Credit Administration’s Commissioning Program**, on March 31, 2015. The objective of the audit was to determine whether FCA was effectively managing the commissioning program. The audit identified opportunities to improve cost monitoring, streamline testing and evaluation, improve contractor oversight, reduce staffing shortfalls, and provide additional feedback to candidates. There were nine recommendations made in the report. All recommendations were closed by FCA by June 2017.
- FCA OIG completed an audit, **Human Capital Planning at the Farm Credit Administration**, on February 29, 2016. The objectives of this audit were to assess the adequacy of the Agency’s human capital planning and the effectiveness of its implementation. The audit focused on three areas of human capital planning: key person dependencies and succession planning, employee hiring and separation, and workplace diversity and inclusion. The audit found that, overall, the FCA had an adequate human capital strategy, however, there were opportunities to improve the human capital plan implementation and processes. In response to the audit, the Agency agreed to implement 11 actions to improve the human capital planning process. All recommendations were closed by FCA by the end of September 2016.
- FCA OIG completed an audit, **Farm Credit Administration’s Employee Separation Process**, on February 9, 2021. The objective of the audit was to determine whether FCA has an efficient and effective process for separating employees. The audit found that while the Agency had established policies and procedures, established access controls for its exit questionnaire data, and performed an analysis in 2019 using exit survey data, there were opportunities to improve the overall effectiveness and efficiency of the separating process. The audit identified improvements that needed to be made to the Personnel Action Report process, the exit survey and interview process, and checkout processes. There were six recommendations made to the Office of Agency Services (OAS). All recommendations were closed by FCA by the end of March 2021.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of this audit was to evaluate FCA’s examination staffing processes. We performed this audit at FCA’s headquarters in McLean, Virginia from July through November 2022.

Scope

The scope of the audit was limited to FCA's examiner staffing from January 1, 2019, through June 30, 2022.

Methodology

We took the following steps to accomplish the objective:

- Identified and reviewed related laws, regulations, and other background information applicable to the objective;
- Identified and reviewed applicable internal FCA policies and procedures;
- Reviewed prior FCA OIG and other external reviews related to the audit objective;
- Interviewed OE, OIT, Office of Equal Employment Opportunity and Inclusion, and OAS personnel on examiner recruiting and staffing, the FCA examiner application processes, timekeeping processes, and privacy information;
- Reviewed the FY 2023 OE Operating Plan for information on recruiting and staffing; and
- Reviewed the FCA Management Control Plan for FYs 2022-2026 and OE internal control reviews applicable to the audit objective.

Tests Performed

- Requested and reviewed the draft recruiting handbook and the information sent to recruiters for the fall 2022 recruiting cycle;
- Reviewed and summarized OE examiner recruiting schedules for 2019, 2020, and 2021. We also reviewed the completed and planned activities for 2022;
- Requested and reviewed OE budgeting and time code information for financial and staffing resources spent on recruiting activities for 2019, 2020, 2021, and 2022. We also requested and reviewed Agency time code reports for the July 2019 through June 2022 period for project code 3164 (Staffing and Job Evaluation) to analyze the use of the code by OE and other offices within the Agency;
- Reviewed a previously issued job announcement for an examiner position. We analyzed the questions listed in the April 2022 examiner job announcement to determine if any recruiting information was tracked in the announcement;
- Requested and reviewed staffing tools for the Association Examination Division, including the planning assignments spreadsheet, scheduling and milestone spreadsheet, and information incorporated in the tools;
- Received access to the web-based scheduling tool and reviewed inputs in the tool and the scheduler guide;

- Requested and reviewed OE staffing contingency plans and documentation on coordination with other offices that may require examination staff support;
- Determined EIC assignments for the last three cycles using the Agency's internal documentation system and determined whether EICs were rotated after three cycles;
- Reviewed the internal personnel action report from July 1, 2019, through June 30, 2022, and OE's attrition dashboard and analyzed trends. Because we used judgmental factors in selecting OE's examination statistics, we cannot project this sample to the population; and,
- Developed and distributed a survey to FCA examination staff with ten or less years of experience at FCA. We reviewed two internal employee systems to develop a list of all active OE examiners under the 0570 job series² and sorted the list by tenure for those that have been with FCA over the last ten years, as of September 8, 2022. We included all active OE examiners, but we did not include one OE administrative support staff member in our survey. We issued the survey to the 97 examiners that met our criteria, and 91 of the 97 recipients completed the survey, resulting in a 94 percent response rate. Because of the response rate, we deemed the results reliable and valid. We analyzed the survey results, which can be found in the Appendix of this report. Because we used judgmental factors in selecting our sample, the survey results cannot be projected to the population.

Generally Accepted Government Auditing Standards

We conducted this audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We reviewed internal controls identified as significant to the audit objective and did not identify any material control weaknesses. We designed audit procedures to assess internal controls to the extent necessary to address our objective. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. We also assessed the reliability of data relevant to our audit objective and determined that the data was sufficiently reliable.

We considered the risk of fraud and abuse during our audit, and nothing came to our attention to indicate fraud or abuse was occurring.

AUDIT RESULTS

We evaluated FCA's examination staffing processes and found that the Agency has made efforts to develop and implement processes aimed to strengthen examiner staffing. We found that the Agency devoted resources, and appropriately budgeted for, examination staff recruiting efforts.

² The 0570 job series is the financial institution examining series.

The Agency also implemented a variety of tools and processes to staff examination projects, and developed processes for scheduling, rotating, and retaining FCA examination staff. However, we identified opportunities for improvement in examiner recruiting, scheduling, and staffing processes.

Recruiting

We determined that FCA is allocating resources to examiner recruiting efforts, but improvements need to be made in collecting recruiting information, analyzing recruiting efforts, and securing data collected in the recruiting process.

Recruiting Programs

Recruiting new examiner talent remains a focus area for OE, given higher-than-expected attrition levels and a workforce with a significant number of senior managers and experienced examiners eligible to retire in the near future. OE's SDD leads the efforts for examiner recruiting and staffing. Over the last four years, on average, OE hired about 19 examination staff per year. OE hires more new staff each year than any other office at FCA.

In order to find and attract highly qualified applicants through targeted outreach, OE established two recruiting programs for entry-level examiners, the ambassador and campus recruiting programs. The recruiting efforts are primarily documented in a draft recruiting handbook. The handbook describes the two types of recruiting efforts:

Ambassadors

Manage the university relationship to attract hard-to-find passive candidates by building relationships at an assigned university and developing awareness of the Agency.

Campus Recruiters

Manage the career and internship fair event, and provide individual students additional information about the Agency, application process, and highlight the Agency as an employer of choice.

Ambassadors' responsibilities include conducting in-person or virtual outreach activities; building and maintaining relationships with university career centers, counselors, and faculty; and establishing relationships with diverse student groups and organizations. Campus recruiters' responsibilities include representing the Agency at career fairs, highlighting the Agency as an employer of choice, educating and informing applicants about the Agency and application process; and following up and encouraging applicants to apply to positions. Ambassadors and campus recruiters are selected on a volunteer basis. OE personnel that manage the recruiting program also consider the examiner's alumni status at colleges and universities.

Recruiting Time Codes and Tracking Resources for Recruiting Activities

OE primarily uses existing examiner staff to recruit for new examiner positions. The Agency generally sends 2 to 3 people to recruit at each location for campus recruiting. OE attends about 20 events each year, with about half in the fall and the other half in the spring. In addition, there are 21 universities currently on the ambassador program listing. Ambassadors may also go to the universities for recruiting activities.

OE allocates important staff time and financial resources to recruiting activities. Personnel assigned to recruiting responsibilities are directed to charge time to project code 3164, Staffing and Job Evaluation, in the FCA timekeeping system when working on recruiting activities. OE tracks resources allocated to these activities with staff days allocated to the code and travel expenses for staff. OE's summaries show that for FY 2019 recruiting efforts, 305 staff days were planned and 242 actual days were used, with travel expenses totaling \$31,370. The summary for FY 2020 showed that 235 staff days were planned, and 248 actual days were used, with travel expenses totaling \$30,095. For FY 2021, 270 staff days were planned and 164 actual days were used with \$0 in travel expenses.³ For the years reviewed, on average, the number of staff days allocated to recruiting activities was about 0.5 percent of total OE activities.

OE officials noted that they consider recruiting activities a good development tool for examination staff and do not view the amount allocated to recruiting activities as significant to OE operations. OE officials also noted they do not pull resources away from examination work to accomplish recruiting activities.

While OE plans for and allocates resources to examiner recruiting efforts, there appears to be a lack of a cost/benefit analysis on whether the efforts and strategies are effective. When asked about analyses performed on recruiting efforts, Agency personnel stated there is limited information captured to analyze recruiting efforts.

OIG Survey

To better understand examiner recruiting and staffing efforts and to solicit examination staff feedback, the OIG designed a survey to issue to examiner staff with ten or less years of experience at FCA. The survey contained 13 questions and was issued on September 12, 2022, to 97 recipients. 91 of the 97 recipients completed the survey, resulting in a 94 percent response rate. Given the response rate of the survey, the respondents' answers account for almost all of the examination personnel that have been hired within the last ten years and remain at the Agency.

There were several questions on the survey relating to the recruiting process. The responses to those questions may be helpful to OE recruiting personnel in understanding the successes of the recruiting efforts from the responses of those examination personnel hired over the last ten years. The 10-year hiring period covered by the survey includes the years impacted by the COVID-19 pandemic when travel and campus recruiting activities were limited. Furthermore, while the

³ The COVID-19 pandemic curtailed all travel in FY 2021 and impacted other campus recruiting efforts in FYs 2020 and 2021.

Agency conducts recruiting activities at universities, it also hires experienced examination staff. These hires are generally not part of campus recruiting activities conducted by the Agency.

The questions below are excerpts from the survey relating to recruiting efforts, and the full survey results can be found in Appendix A.

- Question 3: What college/university did you attend? The OIG asked respondents about the college or university they attended to establish if there was a pattern in hiring examination staff from certain universities. The responses showed 14 schools accounted for over half (53 percent) of the total entries listed by examination staff hired over the last ten years. Further, the top three listed schools accounted for about 20 percent of the entries listed by examiners.
- Question 4: Before you were hired at FCA, how did you find out about the job? The OIG asked survey respondents about how they found out about the job at FCA before they were hired. Of the choices, 46 percent of respondents stated that they searched on USAJobs for the job. Another 11 percent knew someone at the Agency. The remaining 23 respondents, or 25 percent of the total, stated they found out about the job at a career fair or university event. This timeframe includes recruiting activities that were impacted by the COVID-19 pandemic.
- Question 5: Which of the following are true about your recruiting process at FCA? From a list, respondents were asked to select all that apply about their recruiting process. Overall, the feedback was positive about how much personnel knew about the position and its requirements. The most selected answer from respondents was that they had learned about FCA during the recruiting process. The second most selected answer was that they understood the travel requirements for the job. Overall, respondents stated they understood crucial pieces of the job during the recruiting process with 56 respondents selecting they understood the skill sets needed for the job, 47 respondents selecting they had learned about the Farm Credit System, and 44 respondents selecting they understood what an examiner does and understood the hiring process.
- Question 6: How would you rate the examiner recruiting process? We asked this question to understand whether current examiners who we surveyed believe the recruiting process needs improvement. The survey asked respondents to select a response on a scale from the following: 1 (ineffective), 2 (needs improvement), 3 (acceptable), 4 (good), and 5 (outstanding). The respondents' ratings averaged to 3.43, indicating the respondents believe the examiner recruiting process was between acceptable and good.
- Question 7: If you attended a hiring event before being hired, what type of event did you attend where FCA was present? We asked this question to help analyze the effectiveness of recruiting efforts. 59 respondents, or about 65 percent of those surveyed, stated they did not attend events where FCA was present. This statistic indicates that a majority of examiners found out about FCA from something other than a hiring event where FCA was present. Of the remaining 32 respondents, 11

respondents stated they attended an agricultural career fair or event where FCA was present, 10 respondents stated they attended a business career fair or event where FCA was present, 7 respondents stated they attended a general career fair or event where FCA was present, and 1 respondent stated they attended a university presentation where FCA was present. Three total respondents stated other options including that they could not remember, did not attend any events, or attended many events with no FCA presence. As previously noted, campus recruiting activities were impacted by the COVID-19 pandemic. In addition, the data set includes examiners that may have been mid-career hires. These examiners generally would not be recruited through campus recruiting efforts.

While there are many variables that factor into the recruiting and hiring process, understanding how people are finding out about FCA positions and whether the Agency's current efforts are working are important to determine whether certain recruiting efforts and costs are worth the benefits. See complete survey results at Appendix A for detailed responses to the survey.

Recruiting Data Sets

We identified concerns with FCA's collection and storage of certain recruiting data. As part of its recruiting process, OE utilized a quick response (QR) code in its recruiting materials. Potential applicants were asked to scan the code and enter their information. The information was then stored in a listing on OE's internal recruiting site. Over the course of this audit, OE was in the process of changing this process. In February 2022, FCA's OIT approved a change request from OE and updated the QR code form and interface and added a Privacy Act Statement; however, this was a temporary solution. In August 2022, OE officials stated because the recruiting QR code collected personally identifiable information, they were moving away from using the QR code to a different system that allowed individuals to self-register their email addresses at career fairs and that could be used to communicate information on job announcements.

Based on our review of the recruiting site, it appeared that OE did not have a process to restrict access to only those with a need for the information or purge unneeded information from the recruiting site that had collected personally identifiable information from the QR code. The recruiting site contained information on candidates including: first name, last name, email address, career fair visited, date created, date of notice sent, graduation date, onsite interview conducted, and comments. Many of these items include personally identifiable information for individuals who are not FCA employees. The site stored this information on potential candidates for multiple years. Just from February 2020 to September 2022, more than 100 potential candidates' information was stored on the site.

The OIG requested access listings for the recruiting site. OIT provided the OIG with a listing showing all individuals and groups that had access to the recruiting data. All personnel in three different recruiter groups, including personnel from various FCA offices, were on the access listing (four people in one group, 51 people in a second group, and 75 people in a third group).

On August 31, 2022, the OIG notified officials that the QR code was still active and routing to the old online form, not the new system. Officials stated that the same QR code would be used but it would direct to the new system. We noted, as of October 31, 2022, the last entry in the online listing that had been routed to the old online form from the QR code was dated September 28, 2022.

On September 23, 2022, OE requested removal of all QR code recruiting records created prior to September 1, 2021. On the same day, OIT requested removal of the old recruiting form on the FCA website, removal of corresponding data created before September 1, 2021, and that the existing list be changed to read-only for non-administrator use. However, the site still contained personally identifiable information for the potential candidates going back to September 2021. OIT stated that the plan was to remove the remaining data after a year had passed.

Root Causes

Several root causes contributed to the identified opportunities to improve recruiting efforts. From the examiner job application process, the Agency is not soliciting any data on how applicants are finding out about examiner positions, which makes analyzing recruiting efforts difficult. OAS provided an example of a job announcement, which was for an examiner position and was posted in April 2022 on USAJobs. The example announcement did not include a question on how the applicant found out about the job. OAS also provided a copy of the job questionnaire that contained 37 questions, but none relating to recruiting activities from which the applicants may have learned about the job. Agency personnel noted that when applying in USAJobs, applicants are directed to an FCA-specific portion of the application, so the Agency could easily add a question on how the applicant found out about the announcement.

There is also no dedicated time code for OE recruiting. Staff use project code 3164, Staffing and Job Evaluation, for recruiting. However, this code is used Agency-wide for a variety of activities. The Agency's description of the project code states, "recruiting, hiring, relocating staff, merit promotion, termination, job analysis, preparation of position descriptions and performing desk audits." The Agency's timekeeping system shows that based on complete pay periods between July 1, 2019, and June 30, 2022, 11,190 hours (or 1,399 days) were charged to time code 3164 by eight different offices. OE had a total of 5,003 hours (or 625 days) charged to the code for the three-year period. A dedicated time code for recruiting efforts in OE would allow OE to better analyze the costs and benefits of its recruiting efforts.

The Agency had not established structured ways to analyze recruiting efforts. OE personnel confirmed that while they review staffing needs and the Federal Employee Viewpoint Survey, they are not analyzing the recruiting efforts to see what may or may not be working. While OE had created a draft recruiting handbook, information such as what data will be tracked and analyzed is not documented. As another example, when selecting locations for recruiting, OE staff stated the selections are based on available majors, programs, and universities where FCA had previous success at recruiting; however, this selection process is not documented.

Lastly, there have been numerous changes in how the Agency is collecting and storing potential candidate information. Because of these changes, the Agency has not documented how legacy data in the old system is being used, why the Agency needs to keep the information, and how the information will be secured. While the Agency removed information prior to 2021, it remained a concern that the Agency was storing personally identifiable information for potential candidates.

Impact

Because of the importance of hiring examiners and the resources that OE devotes to recruiting efforts, it is vital to capture data on what recruiting efforts may or may not be working. While it is important to attract and hire new talent, understanding the effectiveness of the Agency's efforts and pivoting to new approaches may be necessary to efficiently meet hiring needs. It is also important that the Agency understands the risks associated with storage of information on non-employees, especially if this information is not needed.

Recommendations

To enhance the Agency's recruiting efforts:

1. The Office of Inspector General recommends the Office of Examination coordinate with applicable offices to gather information on how applicants found out about the FCA announcement through the application process.
2. The Office of Inspector General recommends the Office of Examination evaluate the implementation of a project code specific to its recruiting to be able to more efficiently track resources utilized during recruiting efforts and to better analyze the costs and benefits of its recruiting efforts.
3. The Office of Inspector General recommends the Office of Examination document and implement recruiting processes in the recruiting handbook or other documented policies and procedures.
4. The Office of Inspector General recommends the Office of Examination document the plans to remove legacy quick response code recruiting data and implement immediate steps to reduce access to the information until the data is removed.

FCA Response

Management agreed with the recommendations. Management stated it will work with OAS to formalize information gathered during the application process and analyze the information on an annual basis to determine changes needed in the recruiting process. Management stated that it would also work with other offices to determine whether to expand project codes for recruiting. Management stated it is finalizing the recruiting handbook to document the recruiting process. Management also removed legacy recruiting data and implemented a new process for collecting contact information through the recruiting QR code.

Management estimated the actions would be completed by December 2023.

OIG Response

The OIG finds the actions responsive to our recommendations. Due to the corrective actions implemented during the course of our audit, we consider recommendation 4 closed. OE provided formal comments to the report that can be found in the Management Comments section of the report.

Staffing

We found the Agency utilized various tools and datasets to plan examination assignments. We also found that OE had developed a staffing contingency plan to ensure preparedness and analyze potential staffing needs in times of heightened risks and adverse conditions. However, we noted several opportunities to improve documentation and data collection related to staffing.

Examiner Rotation

Although OE generally rotates EICs at least every three consecutive examination cycles, the rotation policy is not documented. Officials stated that rotation had been used for many years to gain a fresh perspective during examinations. They stated that the policy was generally to rotate the EIC at least every three examination cycles, which would generally be after about 4.5 years.⁴ In the Bank Examination Division, officials stated that EICs are sometimes rotated less frequently because of multiple specialists working on an examination, the time it takes to establish relationships, and the specialized knowledge needed for their oversight work. OE tracks and analyzes the number of consecutive times an EIC issues a report of examination for each institution, along with other institution and staffing information, to plan staffing assignments.

We tested rotation by reviewing EIC assignments for the last three examination cycles. We used information in the Agency's internal documentation system and reports of examination to determine EIC assignments. If the EIC was the same for three consecutive cycles, we reviewed the EIC for an additional cycle and OE's planning documents to assess whether examiners were rotated. Our testing revealed EICs were rotated every three examination cycles for all but two institutions. These institutions were assigned to the Bank Examination Division, which was in line with the rotation guidelines described by OE officials.

Scheduling

Although OE developed a robust scheduling process, it was not fully documented. OE conducts regular planning meetings to assign key staff, including EICs, assistant EICs, and reviewing officials. Various factors are considered in making key staff assignments. In addition to rotation and the number of consecutive assigned examination cycles, factors include institution risks; an examiner's number of assignments; examiner skill sets and experience; and geographic location and time

⁴ Section 5.19 of the Farm Credit Act of 1971, as amended, states that "[e]ach institution of the System shall be examined by [FCA] examiners at such time as the Board may determine, but in no event less than once during each 18-month period."

zone differences. Once key staff are assigned, supervisors use a web-based tool to schedule staff for examination activities.

OE’s web-based scheduling tool was developed by OIT to provide streamlined, real-time scheduling information. The tool allows supervisors to determine staff scheduling availability and sort by different factors, including field office location, position, and specialization. OE Directive 48, *Scheduling*, documents guidance on scheduling examinations and projects. However, the directive does not reference the web-based scheduling tool and includes outdated roles and responsibilities for division schedulers.

Attrition Data

We identified concerns with FCA’s collection and storage of certain attrition data. In 2022, OE developed an attrition dashboard and implemented access controls to a limited number of personnel. The dashboard provides on-demand information on OE staffing levels, attrition, staffing targets, staffing gaps, and retirement eligibility. The dashboard replaced manual processes to more effectively monitor staff resources to support OE reporting and Agency retention initiatives. In October 2022, the dashboard reported:

Office of Examination Staff by Position				
	Active OE Employees	Retirement Eligible Through 2026	Attrition of Commissioned Examiners	Total Attrition ⁵
Administrative Support	5	1		
Analysts	2	2		
FCA Examiners	41	6	7	7
Management	8	6		2
Non-Supervisory Senior Examiners	6	2	1	1
Program/Portfolio Managers	9	5	1	1
Specialists	31	13	6	9
Supervisory Senior Examiners	15	2		
Tier 1 Associate Examiners	25			3
Tier 2 Associate Examiners	31			5
Total	173	37	15	28

OE’s tracking of examiner staffing highlights staffing needs, especially for examiner and specialist positions. Further, the loss of commissioned staff can diminish investments in training and create gaps in knowledge and experience, which should continue to be monitored and addressed.

⁵ Total attrition for October 2021 to October 2022.

The attrition dashboard also includes additional employee information to further analyze human capital trends. Specifically, the dashboard includes examiner name, commissioned status, grade level, division, location, position, and tenure with the Agency. Additional supplemental data is incorporated in the dashboard when an employee leaves OE. Supplemental attrition data is collected by supervisors and added to the database, if provided. The following information was incorporated in the dashboard for separated employees:

- Type of position change (for example, resignation, transfer, or retirement);
- Cause of separation (for example, commercial position, different government position, Farm Credit System position, or personal reasons);
- Whether the separation is for a job with higher pay; and,
- Whether the separation is for a flexiplace job.

Aggregate totals in the dashboard can be expanded to identify the specific employees and associated employee data in the selected category. While we understand how certain information can be helpful in understanding attrition, the collection and storage methods on former employees needs to be documented and approved in coordination with other offices to ensure that such data is properly protected and retained.

Root Causes

Several root causes contributed to identified opportunities to improve rotation, scheduling, and staffing. Although our testing revealed rotation was taking place, OE's rotation policy had not been documented. Officials stated that rotation had been in place for a very long time, with rotation practices varying between the Association Examination Division and Bank Examination Division. However, this control was not documented in policies and procedures. Officials stated that they were considering addressing rotation in OE Directive 48 on scheduling, which was last updated in November 2012. Because it had not been updated in ten years, the directive also did not fully address OE's current scheduling processes. Implementation of the web-based scheduling tool resulted in different roles, responsibilities, and processes for scheduling that could be included in an updated directive.

In addition, development of the attrition dashboard was reviewed and approved through OIT; however, the review did not address supplemental attrition data. OIT reviewed the dashboard to consider security, privacy, and records retention risks, and approved the project in April 2022. OIT's review stated that the dashboard would include data that is already available to select OE staff. However, the review did not address supplemental data collected by supervisors on separating employees' new employer, pay, and workplace arrangements. We also noted that supplemental attrition data was not collected through a standardized exit questionnaire, and it is questionable whether the employees exiting the Agency even knew that the information on their activities was being collected. This process presents additional risks and may not convey how supplemental attrition data is being used, stored, and safeguarded by the Agency.

Impact

Scheduling practices and staffing data are essential to maintaining an effective oversight program. Current policies and procedures support consistent application of control activities and help ensure that agreed-upon processes are utilized. Further, evaluating the full scope of data in the attrition dashboard ensures necessary controls are considered as well as compliance with applicable requirements for collection and storage.

Recommendations

To improve staffing documentation and data:

5. The Office of Inspector General recommends the Office of Examination document the examiner rotation policies.
6. The Office of Inspector General recommends the Office of Examination update Directive 48, *Scheduling*, to reflect current processes.
7. The Office of Inspector General recommends the Office of Examination document what information is collected, stored, and maintained on former employees and consider privacy, security, and records retention requirements in coordination with other applicable offices.

FCA Response

Management agreed with the recommendations. Management stated they would document examiner rotation policies and update the OE Directive on scheduling. Lastly, management stated they would coordinate with other FCA offices to consider privacy, security, and records retention requirements for supplemental attrition data on former employees.

Management estimated the actions would be completed by December 2023.

OIG Response

The OIG finds the actions responsive to our recommendations. OE provided formal comments to the report that can be found in the Management Comments section of the report.

Management waived an exit conference.

MANAGEMENT COMMENTS

Farm Credit Administration

Office of Examination
1501 Farm Credit Drive
McLean, VA 22102-5090
(703) 883-4160



January 19, 2023

TO: Sonya Cerne, AIG for Audits, Inspections, and Evaluations
FCA Office of Inspector General

FROM: Mike Duffy, Director and Chief Examiner,
Office of Examination

SUBJECT: Response to OIG's draft audit report titled, Farm Credit Administration's
Examiner Staffing Program, A-22-03

This memorandum responds to the draft audit report from the Office of Inspector General, dated December 19, 2022, titled, *Farm Credit Administration's Examiner Staffing Program, A-22-03*. The stated objective of the audit was "to evaluate FCA's examination staffing processes."

The draft audit report included recommendations to enhance the Agency's recruiting processes and to improve staffing documentation and data. The Office of Examination agrees with the recommendations and plans to take corrective action for each of the issues noted. We have already taken action to address some of the items.

While we agree with the report recommendations, we believe it is important to highlight certain conditions that affected OIG's survey results on our college recruiting process. As noted in the report, we did not complete on-campus recruiting or attend career fairs for approximately two years due to the pandemic. Nevertheless, we continued to hire experienced examiners and technical specialists who would not have had an opportunity to participate in our college recruiting efforts. As a result, the number of surveyed employees who could have learned about FCA through our college recruiting process was significantly reduced, making it challenging to draw conclusions about the effectiveness of those efforts.

Despite the recruiting challenges created by the pandemic, we continued to hire a talented, diverse group of examiners over the past two years. Given the inability to participate in career fairs and recruiting events, we worked with several alumni to connect with university career centers and developed several employee videos with OCPA's assistance, promoting FCA as a great career choice.

OE is also continuing to work with the Chief Diversity Officer to expand opportunities for a diverse group of candidates. We are developing relationships with Historically Black Colleges

and Universities, Hispanic Serving Institutions, and other minority serving institutions. We also look forward to implementing an updated recruiting brochure and the new Ambassador Program which will focus on developing ongoing relationships with colleges where we have been successful in finding good candidates.

Thank you for the opportunity to respond to the report. We will address the recommendations and continue to look for ways to enhance the effectiveness of our staffing processes.

ACRONYMS

EIC	Examiner-in-Charge
FCA or Agency	Farm Credit Administration
FCS or System	Farm Credit System
FY	fiscal year
OAS	Office of Agency Services
OE	Office of Examination
OIG	Office of Inspector General
OIT	Office of Information Technology
QR	quick response
SDD	Staff Development Division

APPENDIX A-SURVEY RESULTS

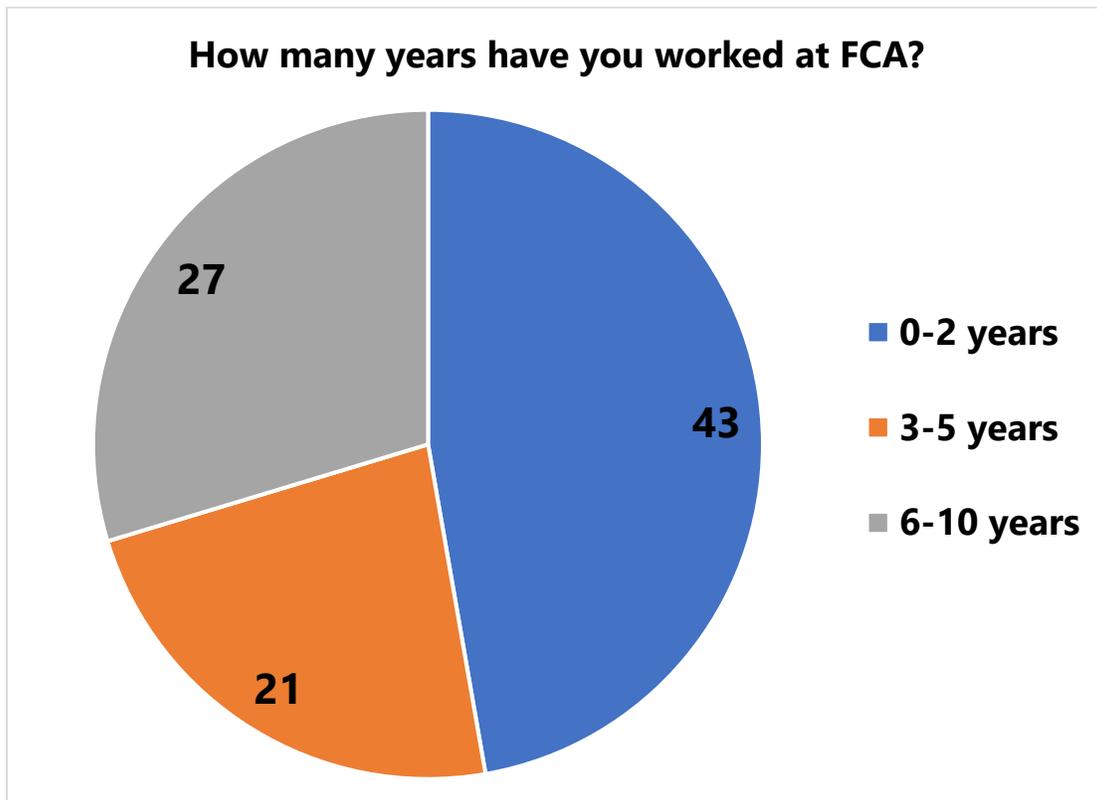
The OIG designed a survey for current examination staff with ten or less years of experience at FCA. The survey covered FCA's recruiting process and retention efforts. The OIG issued the survey to 97 examiners, with 91 of the 97 recipients completing the survey, resulting in a 94 percent response rate. The survey included 13 questions, which included a question at the end to leave comments on FCA's recruiting process or retention efforts. The subsequent information summarizes the results of the survey from the 91 respondents.

The 10-year hiring period covered by the survey includes the years impacted by the COVID-19 pandemic when travel and campus recruiting activities were limited. Furthermore, while the Agency conducts recruiting activities at universities, it also hires experienced examination staff. These hires are generally not part of campus recruiting activities conducted by the Agency.

Question 1

How many years have you worked at FCA?

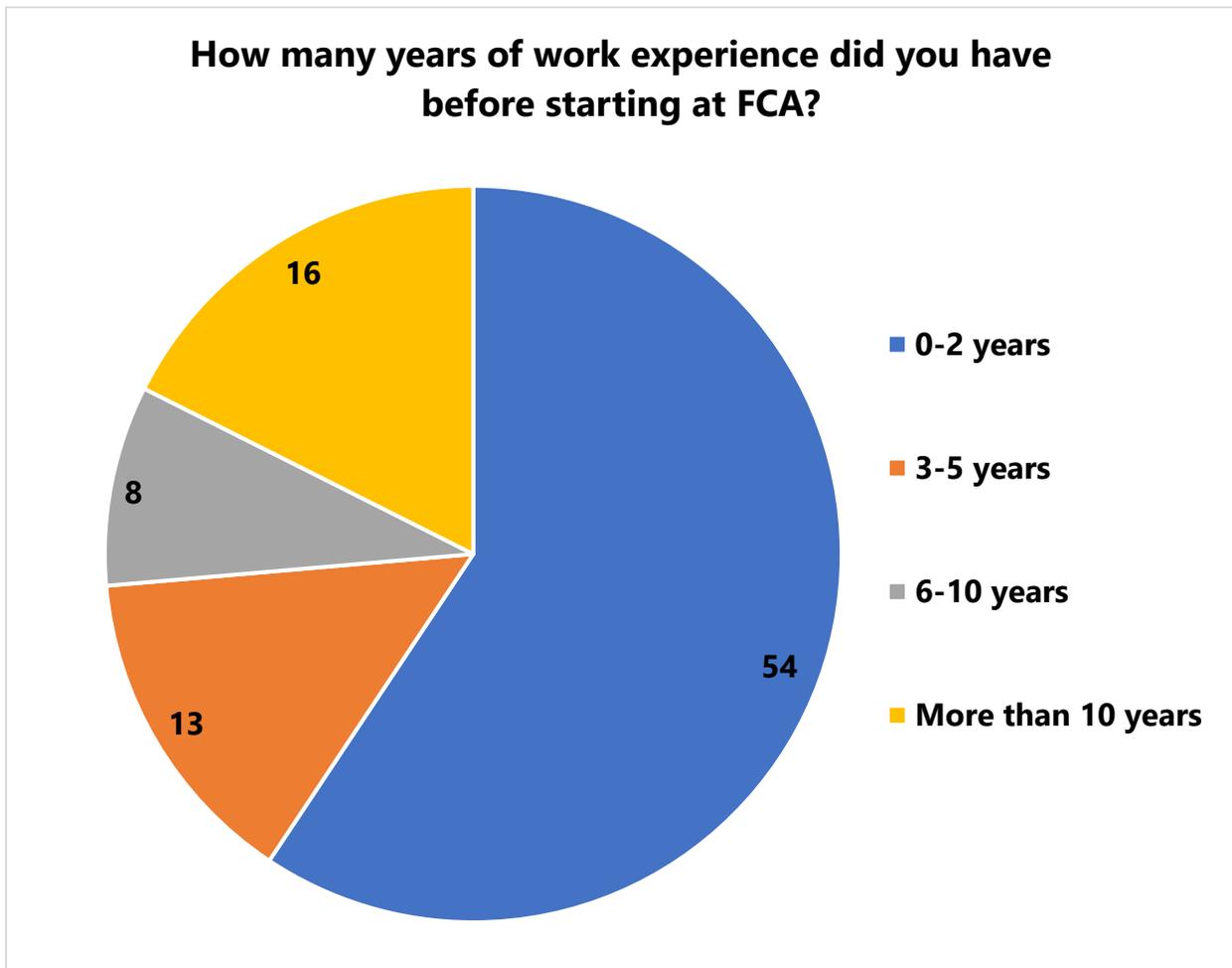
In order to establish background information on respondents for the survey, the OIG asked how long they have worked at FCA. The largest number of respondents have worked at FCA 0-2 years (43 of 91 responses). 21 of the 91 respondents stated they have worked at FCA for 3-5 years, and 27 respondents stated they have worked at FCA for 6-10 years.



Question 2

How many years of work experience did you have before starting at FCA?

For additional background information, the OIG asked respondents about their previous work experience. This helped establish how many of the respondents may be considered mid-career personnel. The largest portion of respondents, 54 of the 91 respondents, stated they had 0-2 years of work experience before starting at FCA. Of the remaining respondents, 13 stated they had 3-5 years of work experience, 8 respondents stated they had 6-10 years of work experience, and 16 respondents stated they had more than 10 years of work experience before starting at FCA.



Question 3

What college/university did you attend?

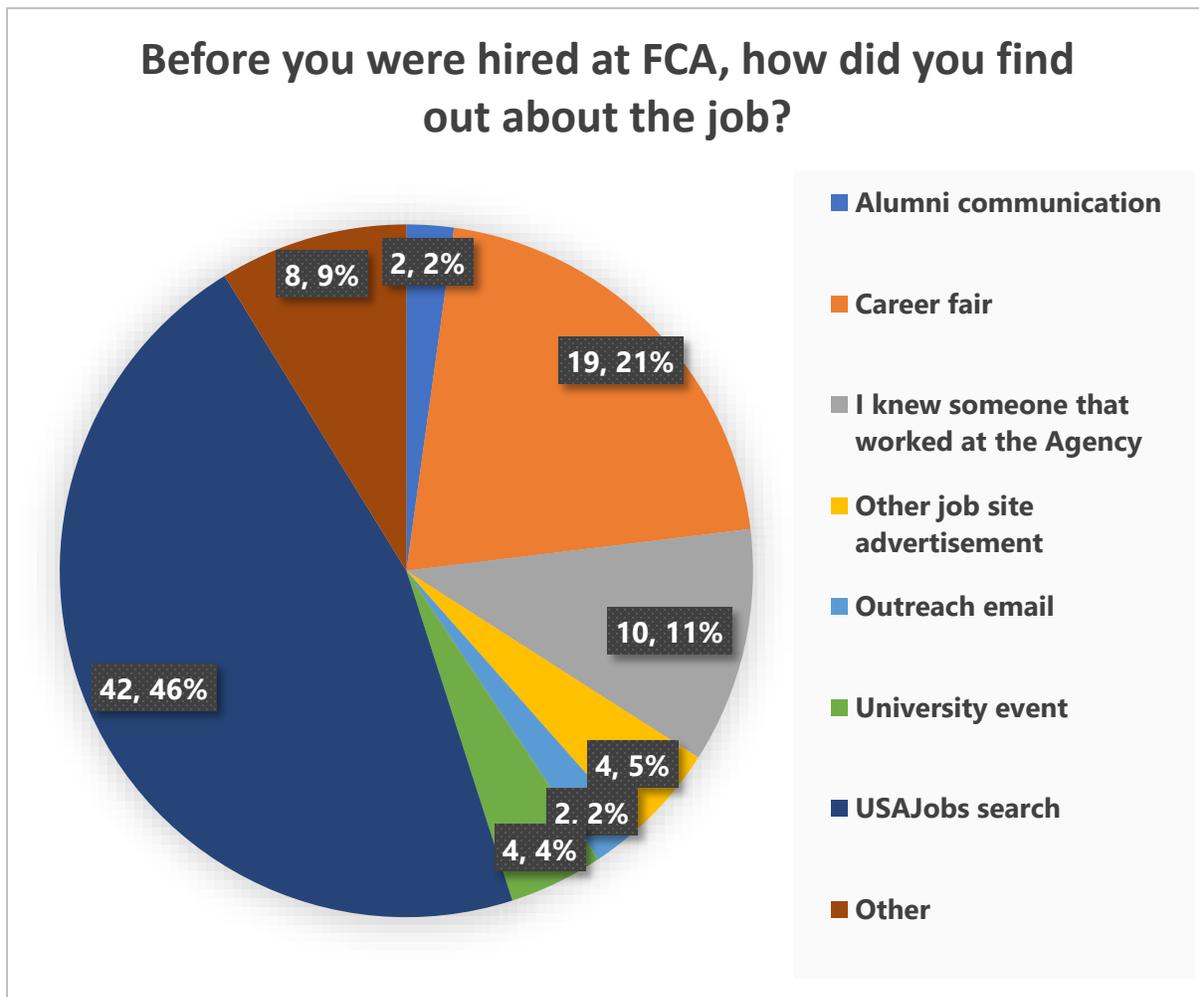
The OIG asked respondents about the college or university they attended in order to establish if there was a pattern in hiring examination staff from certain universities. This information could also be useful to understand if recruiting efforts in certain areas were successful or not. Out of the 91 respondents, 90 listed their college/university and one omitted a response. Seven respondents listed more than one school and some differentiated undergraduate and graduate programs. In total, respondents listed 61 different schools. Most universities and colleges were only listed once; however, the chart below shows 14 schools that had more than one entry and accounted for over half (53 percent) of the total entries. Of note, the top three listed schools account for 19 entries from respondents and are all located close to FCA field offices.

University/College Listed by Respondents	Total Entries
Colorado State University	8
University of Wisconsin - River Falls	6
University of Minnesota	5
Iowa State University	4
Texas A&M University	4
Texas Tech University	4
New Mexico State University	3
University of Texas at Dallas	3
Virginia Tech University	3
California State University, Sacramento	3
Clemson University	2
University of Maryland	2
University of Minnesota Crookston	2
University of North Dakota	2

Question 4

Before you were hired at FCA, how did you find out about the job?

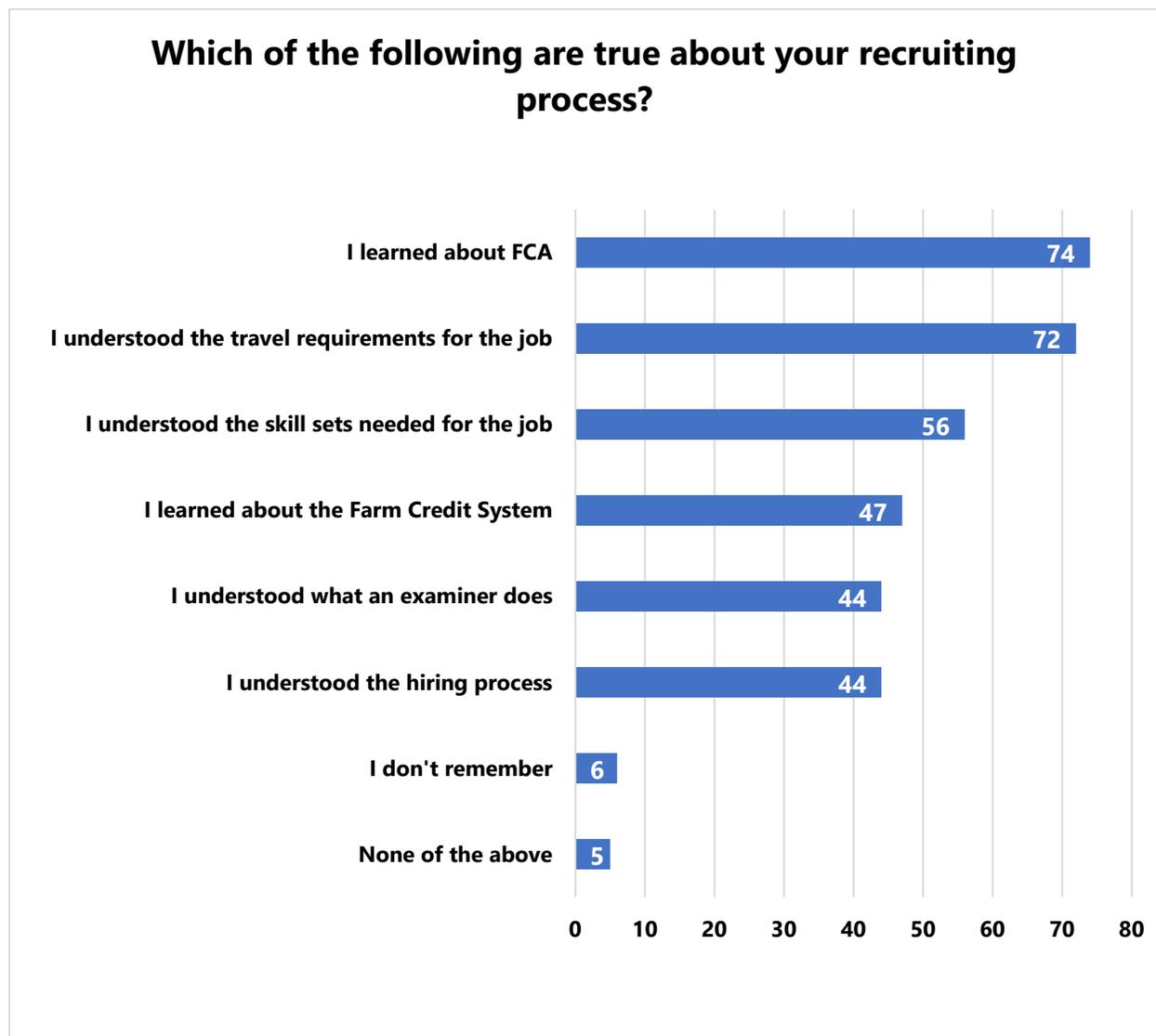
The OIG asked survey respondents how they found out about the job at FCA before they were hired. Of the choices, 42 of the 91 respondents, or 46 percent, selected that they searched on USAJobs for the job. Of the 91 respondents, 19, or 21 percent of total respondents, stated they found out about the job at a career fair. For the remaining 30 respondents, 10 respondents stated they knew someone that worked at the Agency, 4 respondents stated there was another job site advertisement, 4 stated there was a university event, 2 stated there was an outreach email, 2 stated they had an alumni communication, and 8 selected "other." Of note, although social media was an option, no respondents selected this choice. The 10-year hiring period covered by the survey includes the years impacted by the COVID-19 pandemic when travel and campus recruiting activities were limited. Furthermore, while the Agency conducts recruiting activities at universities, it also hires experienced examination staff. These hires are generally not part of campus recruiting activities conducted by the Agency.



Question 5

Which of the following are true about your recruiting process at FCA (respondents were asked to select all that apply)?

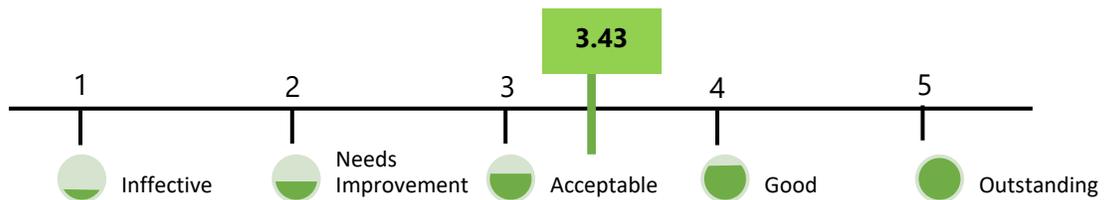
The OIG asked respondents about their recruiting process at FCA. From a list, respondents were asked to select all that apply. The most selected answer from respondents was that they had learned about FCA during the recruiting process. The next most selected answer was that they understood the travel requirements for the job. Overall, respondents stated they understood crucial pieces of the job during the recruiting process with 56 respondents selecting they understood the skill sets needed for the job, 47 respondents selecting they had learned about the Farm Credit System, and 44 respondents selecting they understood what an examiner does and understood the hiring process.



Question 6

How would you rate the examiner recruiting process?

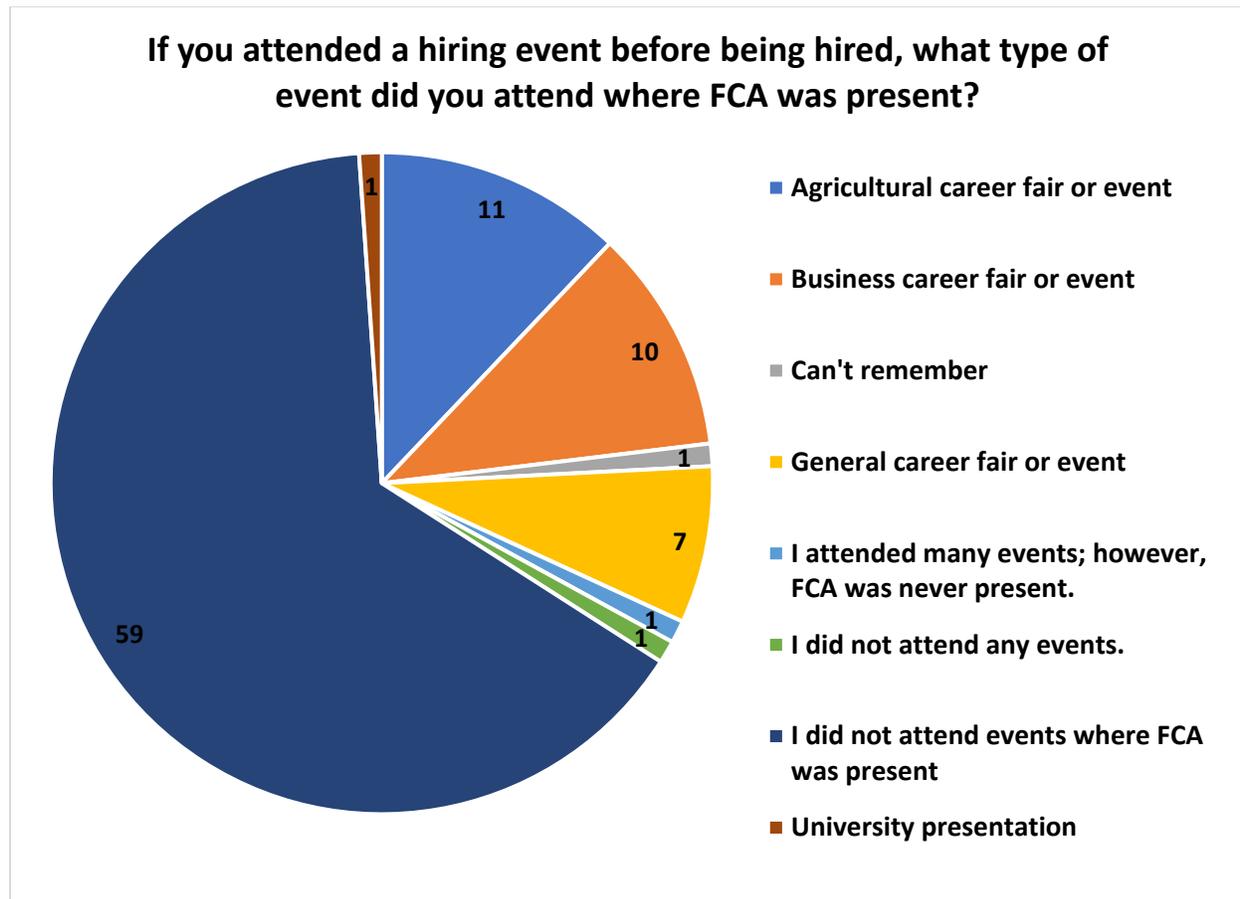
The OIG asked respondents to rate the examiner recruiting process. This information could be helpful in understanding whether current employees believe the recruiting process needs to be improved. Respondents were asked to select a response on a scale from the following: 1 (ineffective), 2 (needs improvement), 3 (acceptable), 4 (good), and 5 (outstanding). The respondents' ratings averaged to 3.43, indicating the respondents believe the examiner recruiting process was between acceptable and good.



Question 7

If you attended a hiring event before being hired, what type of event did you attend where FCA was present?

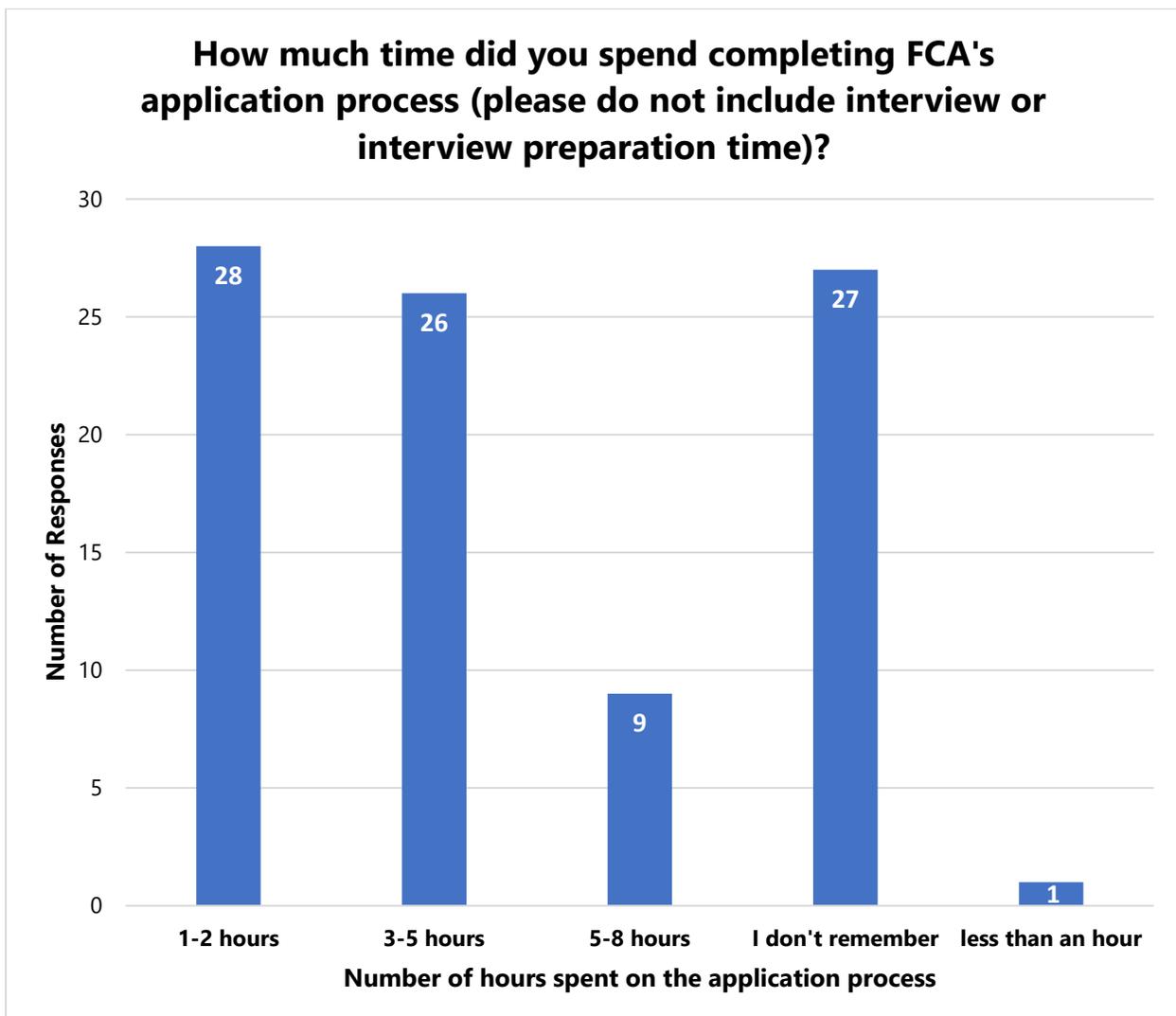
The OIG asked respondents about their attendance at hiring events where FCA was present before being hired. This information could be helpful in analyzing recruiting efforts and whether career fairs are a good use of resources. For example, 59 respondents, or about 65 percent, stated they did not attend events where FCA was present. This may indicate a need to analyze recruiting efforts in this area because most of the examiners did not attend hiring events where FCA was present. Of the remaining 32 respondents, 11 respondents stated they attended an agricultural career fair or event where FCA was present, 10 respondents stated they attended a business career fair or event where FCA was present, 7 respondents stated they attended a general career fair or event where FCA was present, and 1 respondent stated they attended a university presentation where FCA was present. Three total respondents stated they cannot remember, did not attend any events, or attended many events, but FCA did not attend those events. The 10-year hiring period covered by the survey includes the years impacted by the COVID-19 pandemic when travel and campus recruiting activities were limited. Furthermore, while the Agency conducts recruiting activities at universities, it also hires experienced examination staff. These hires are generally not part of campus recruiting activities conducted by the Agency.



Question 8

How much time did you spend completing FCA's application process (please do not include interview or interview preparation time)?

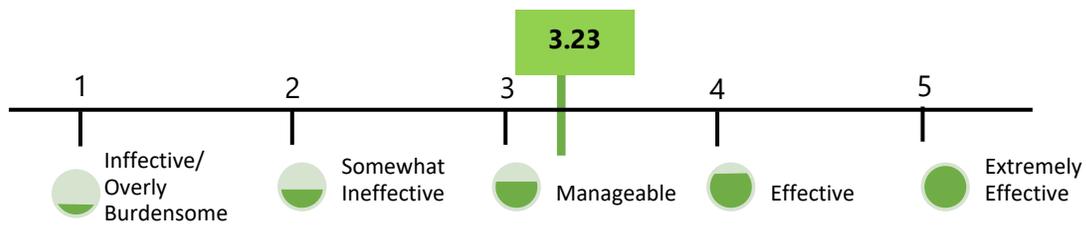
To understand the application process, the OIG asked respondents how much time they spent on completing FCA's application process. Respondents were asked to not include interview or interview preparation time in their answers. Three answers were almost equal where respondents stated 1-2 hours (28 respondents), 3-5 hours (26 respondents), or they did not remember (27 respondents). Of the remaining respondents, 9 stated the application process took 5-8 hours and 1 respondent stated less than an hour. Although there was an option for more than 8 hours, no respondents selected this answer.



Question 9

How would you rate FCA's hiring assessment during the application process?

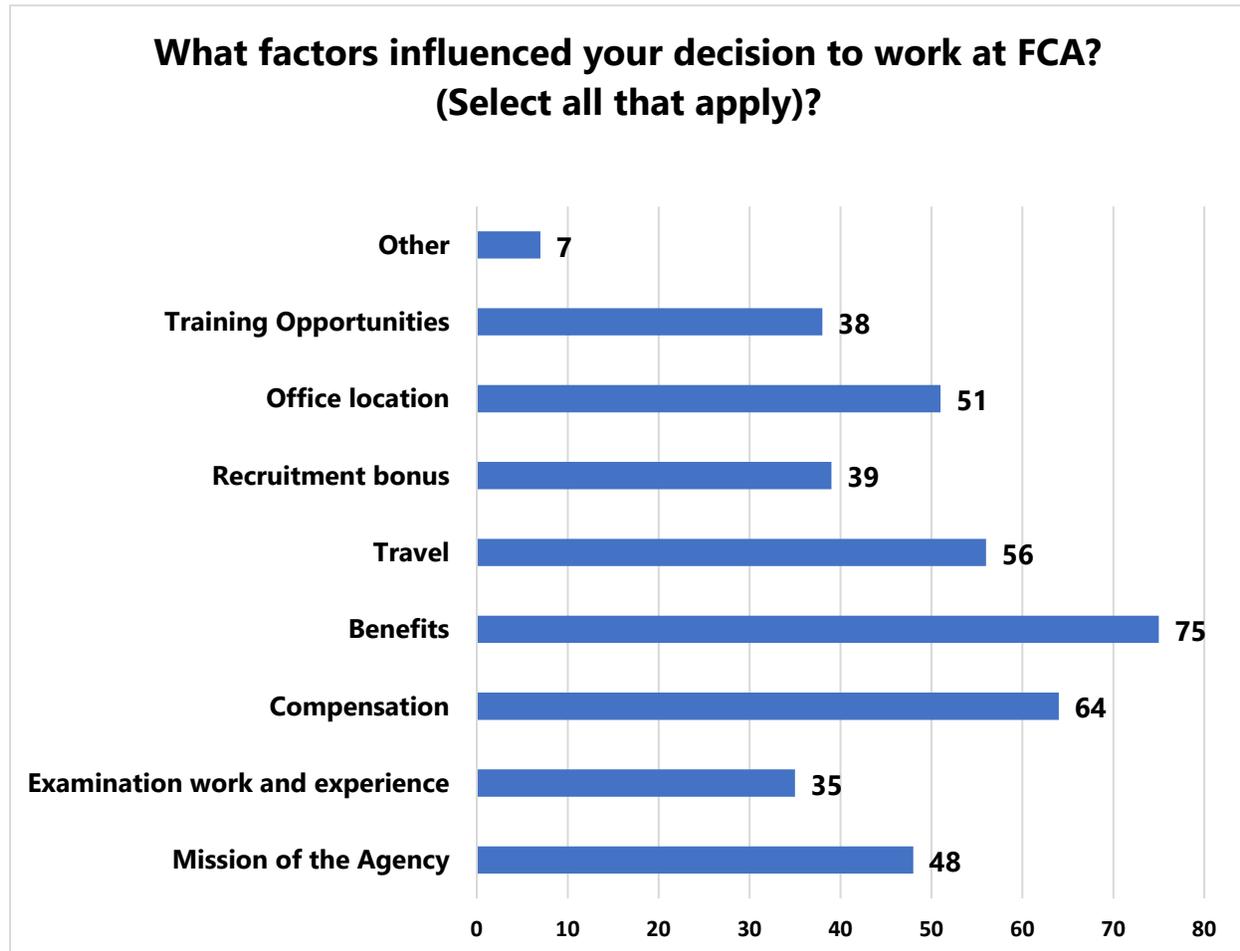
The OIG asked respondents to rate FCA's hiring assessment that is given during the application process. Respondents were asked to select a response on a scale from the following: 1 (ineffective/overly burdensome), 2 (somewhat ineffective), 3 (manageable), 4 (effective), to 5 (extremely effective). The respondents' ratings averaged to 3.23, indicating the respondents believe the hiring assessment was manageable but not quite effective or extremely effective.



Question 10

What factors influenced your decision to work at FCA? (Select all that apply)?

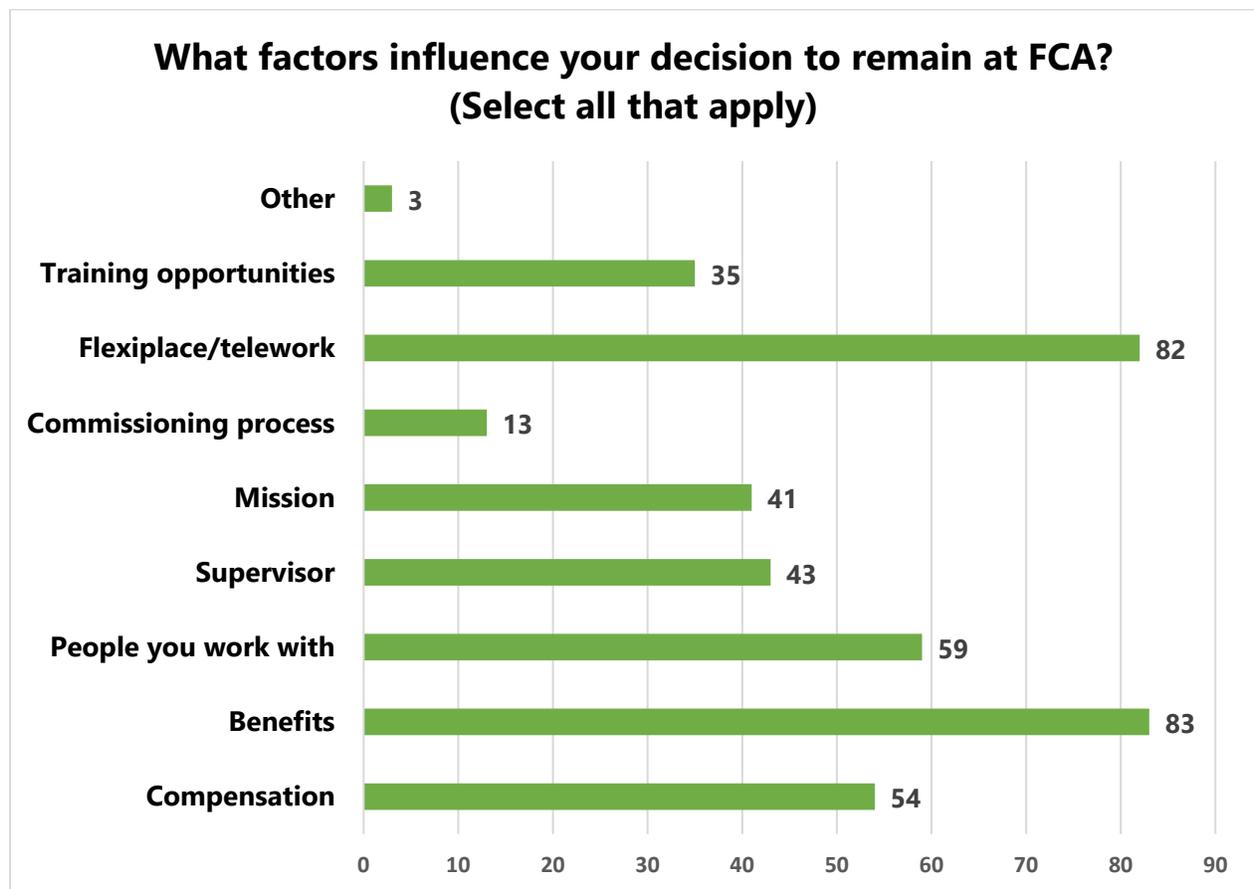
In order to understand why respondents wanted to work at FCA, the OIG asked respondents to select factors that influenced their decision. Respondents were asked to select all factors that applied. The most selected factor was benefits with 75 respondents selecting this factor. The next highest area was compensation with 64 respondents selecting this factor. Respondents selected travel and office location as the third and fourth most selected factors, respectively. Next, respondents selected mission of the Agency, recruitment bonus and training opportunities as the other factors that influenced their decision to work at FCA. The least selected item was examination work and experience, but this factor had 35 selections, which was significant. In addition, 7 respondents selected other and named additional factors such as telework options, promotion, schedule, and experience.



Question 11

What factors influence your decision to remain at FCA? (Select all that apply)

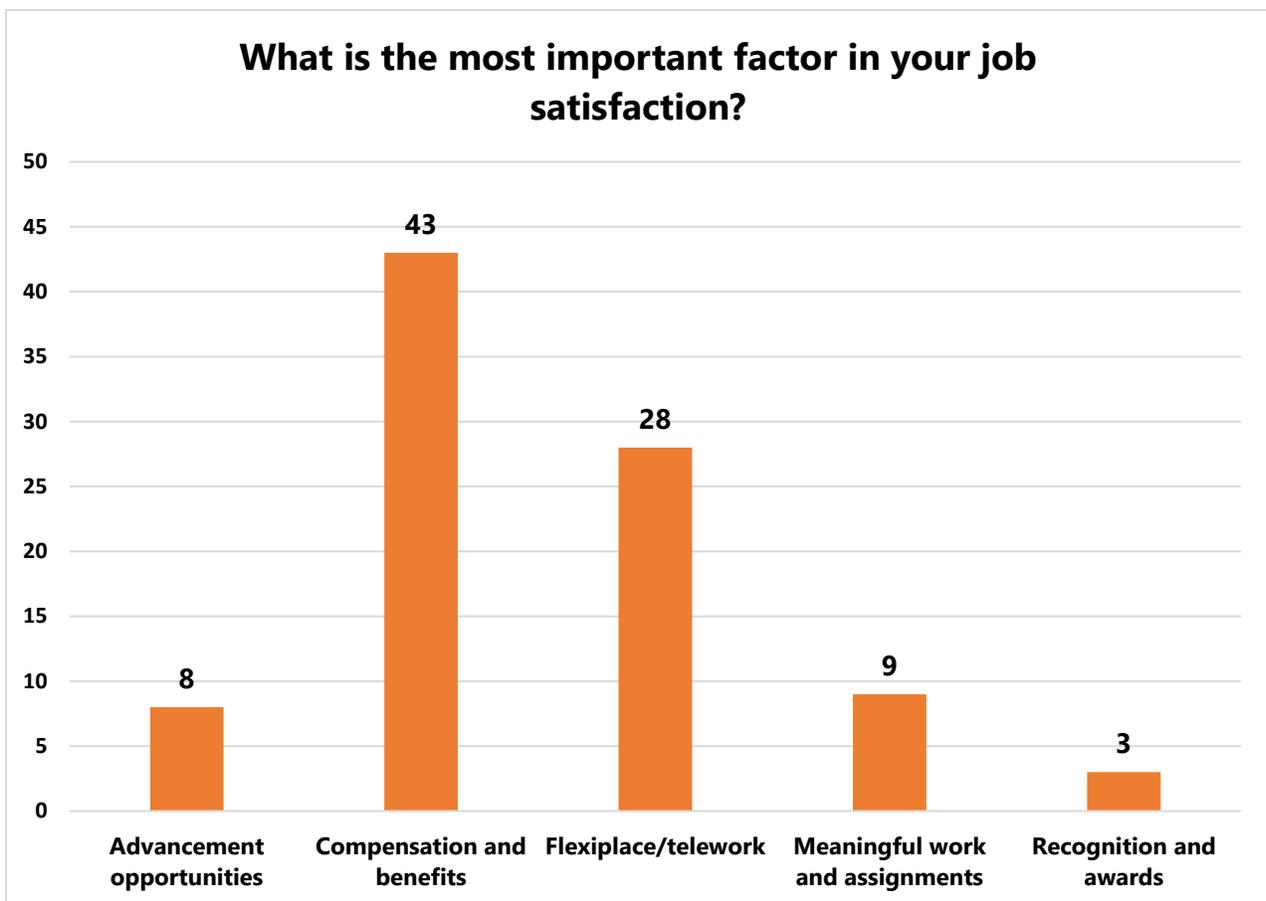
To understand why respondents remained at FCA, the OIG asked respondents to select all factors that influenced their decision. The most selected factor was benefits with 83 of the 91 respondents selecting this factor. The second most selected answer was flexiplace/telework, with 82 respondents selecting this factor. The third and fourth most selected answers were people you work with and compensation, respectively. Respondents selected their supervisors, mission, and training opportunities as other factors influencing their continued employment at FCA, but the commissioning process was only selected by 13 respondents. There were three respondents that selected other and listed additional factors, such as travel and office location.



Question 12

What is the most important factor in your job satisfaction?

The OIG asked respondents to select the most important factor in their job satisfaction. Of the 91 respondents, 43 stated compensation and benefits was the most important factor, which accounted for 47 percent of the respondents' answers. The second most selected factor in job satisfaction was flexiplace/telework. This accounted for 28, or 31 percent of the respondents' selections. Of the remaining respondents, 9 selected meaningful work or assignments, 8 selected advancement opportunities, and 3 selected recognition and awards. This information could be useful in determining factors that could help improve attrition rates and influence policy-making decisions on examiner compensation, benefits, and remote work options.



Question 13

Please leave any additional comments on FCA's recruiting process or retention efforts.

For the last question in the survey, the OIG asked respondents to leave any additional comments on FCA's recruiting process or retention efforts. Of the 91 respondents, 26 did not leave additional comments or left comments that were not substantial in nature. The remaining respondents left 65 comments, and the OIG grouped the comments by theme.

- 12 comments were generally positive remarks on FCA's efforts. One respondent stated that retention efforts have been going in the right direction recently, with allowing more telework and pay adjustments. Another respondent stated that FCA efforts to retain employees appear reasonable, although some staff may expect even more. The respondent stated they appreciated all of the attention the Agency has given to this issue.
- 17 comments were about pay and benefits. Most of the respondents stated that pay increases have not held up against inflation increases. Most concerning is that several respondents noted struggles in cost-of-living situations that may force them to look for positions outside of FCA. Respondents' comments seemed generally happy with FCA's compensation packages, however, many felt this was not enough. One respondent stated the following, "Recently the board released their benefit package to combat retention issues. However, none of those items would retain anyone given their insignificant changes/applicability. Retention is still an issue and staff, mainly exam staff, are suffering because of it."
- 11 comments were about the recruiting and hiring process. One respondent remarked that FCA recruits the same young people, from the same colleges over and over again as recent graduates. Several respondents noted the length of time the hiring process takes for new hires. Another respondent noted that recruiting should be implemented at new universities outside of office locations.
- 6 comments were about retention efforts. Most of the comments brought up the struggle to stay at FCA with rising costs. One respondent stated that most Associate Examiners rent their apartments and their own rent went up 20-22 percent and noted this could create a retention problem.
- 5 comments were in favor of or against flexiplace and telework options. Some respondents stated that telework and flexiplace should be increased. One respondent stated that telework is not a good environment for learning a new job.
- 14 comments either combined more than one theme or did not include a theme noted above. Some of those comments are noted below:
 - "FCA needs to implement an accelerated commissioning process for Mid-Career hires; or recognize higher educational achievements (i.e. MBA) and/or FCS job experience for advancement opportunities. The current 'glass ceiling' which inhibits advancement opportunities for non-commissioned Mid-Career hires is simply inequitable. It is also a lost opportunity for the agency to diversify its work force

and leverage relevant knowledge and skill sets of highly qualified and competent individuals.”

- “Retention is negatively impacted due to a lack of leadership at FCA, and the cumbersome and overly burdensome commissioning process.”
- “It would be nice to see FCA improve recruiting processes surrounding diversity and inclusion. Most new-hire classes are majority white, and male. As we evolve, we need to see this practice improve.”
- “FCA has improved efforts to diversify new hires in recent years. FCA's practice of hiring back former examiners (who quit) at a higher grade or rate of pay is a slap in the face to all employees who have never left the agency. More focus should be done to acknowledge examiners who have stayed to serve the agency since hiring.”



Farm Credit Administration
Office of Inspector General

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