September 28, 2016

MEMORANDUM FOR: Joel Neimeyer
Federal Co-Chair

FROM: David Sheppard
Inspector General

SUBJECT: Denali Commission’s Compliance with FY 2015 Improper Payments Requirements—Memorandum No. DCOIG-16-010-M

This memorandum provides our conclusion on the Denali Commission’s compliance with FY 2015 reporting on improper payments. We conducted this review to comply with the requirements of the Improper Payments Information Act of 2002 (IPIA)—as amended by the Improper Payments Elimination and Recovery Act of 2010 (IPERA) and the Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA)—and Office of Management and Budget (OMB) Circular A-123, Appendix C, “Requirements for Effective Estimation and Remediation of Improper Payments,” as amended.

Our objective was to review the accuracy and completeness of the Commission's reporting, as well as agency performance in reducing and recapturing improper payments, if applicable. OMB approved the Denali Commission’s FY 2015 agency financial report on August 10, 2016. The agency published the report on its website on August 30, 2016, and we performed our review in September 2016.\(^1\)

The Commission’s FY 2014 risk assessment did not identify any programs as susceptible to significant improper payments. Therefore, the Commission was not required to conduct a risk assessment in FY 2015 or publish improper payment estimates, programmatic corrective action plans, annual reduction targets, and gross improper payment rates in their FY 2015 agency financial report.

Overall, we found that the Denali Commission met the applicable OMB criteria for compliance with IPIA, as amended, for FY 2015.

We performed this review under authority of the Inspector General Act of 1978, as amended (5 U.S.C. app). This review was conducted in accordance with the Quality Standards for Inspection and Evaluation (January 2012) issued by the Council of the Inspectors General on Integrity and Efficiency.

\(^1\) OMB Circular 123, Appendix C, October 20, 2014, requires inspectors general to review the agency’s annual agency financial report, and accompanying materials, to determine if the agency is in compliance under IPERA, as amended. This review should be completed within 180 days of publication of the agency financial report.
We will issue a copy of this memorandum to the Senate Committee on Homeland Security and Governmental Affairs; House Committee on Oversight and Government Reform; Comptroller General of the United States; and the OMB Controller.

We would like to thank the Commission staff for their cooperation during our review. Please contact me at (206) 220-7970 if you would like to discuss the results of this review.

cc:  Denali Commissioners
     Corrine Eilo, Chief Financial Officer, Denali Commission
     David Smith, Deputy Inspector General, U.S. Department of Commerce