

# U.S. Office of Personnel Management

## AUDIT RESPONSE POLICIES AND PROCEDURES

March 2026

**U.S. Office of Personnel Management  
Audit Response Policies and Procedures**

| <b>Version</b> | <b>Date</b> | <b>Revision</b> |
|----------------|-------------|-----------------|
| 1.0            | March 2026  | Initial Release |

# U.S. Office of Personnel Management Audit Response Policies and Procedures

## Contents

|   |    |
|---|----|
| Purpose .....   | 3  |
| Scope .....   | 3  |
| Authorities .....   | 3  |
| Additional References and Resources .....   | 3  |
| Program Audits Policies and Procedures .....  | 3  |
| Healthcare and Insurance Contractor Audits .....  | 10 |
| Roles and Responsibilities .....  | 10 |
| Definitions .....   | 12 |
| Exhibit A Audit Recommendation Response .....   | 13 |
| Exhibit B Certificate of Completion of Corrective Action .....                                      | 14 |
| Exhibit C Agency Response to OIG Semiannual Report to Congress: Standard Operating Procedures ..... | 15 |
| Appendix A HI Contractor Audit Resolution and Follow-Up Policies and Procedures .....               | 16 |

# U.S. Office of Personnel Management Audit Response Policies and Procedures

## Purpose

This document sets forth the U.S. Office of Personnel Management's (OPM's) policies and procedures for responding to audits of OPM programs (Program Audits) and Healthcare and Insurance contractors (Contractor Audits). Program Audits are generally conducted by the United States Government Accountability Office (GAO) and OPM's Office of Inspector General (OIG) but may also be done by other federal agencies. Contractor Audits are conducted by the OIG. For the avoidance of doubt, these policies and procedures do not apply to audits of OPM's financial statements, which are the responsibility of OPM's Office of the Chief Financial Officer.

## Scope

These policies and procedures form part of OPM's governance framework.

## Authorities

These policies and procedures are issued under the authority of 31 U.S.C. §720 with respect to responses to GAO reports and The Inspector General Act of 1978, as amended (codified at 5 U.S.C. Ch. 4) with respect to responses to OIG audit reports. It is also issued pursuant to Office of Management and Budget (OMB) Circular A-50, *Audit, Inspection, or Evaluation Follow-Up*, and OMB Memorandum M-22-04, *Promoting Accountability through Cooperation among Agencies and Inspectors General*.

## Additional References and Resources

GAO-2-105184, Key Practices to Successfully Address High-Risk Areas and Remove Them from the List, March 2022

OPM's Risk Management Council (RMC) Charter, Version 8.0, January 2026.

## Program Audits Policies and Procedures<sup>1</sup>

### 1. **Policy: OPM is committed to fully cooperating with auditors as they fulfill their statutory audit mandates.**

1.1. **Procedure:** OPM's Chief Risk Officer (CRO)<sup>2</sup> shall be responsible for day to day management of OPM's audit response program, including articulating and advocating for the significance of the audit, inspection, or evaluation processes and promoting responsiveness to any recommendations that emerge from these procedures. The CRO shall be designated as OPM's Agency Follow-Up Official (as such term is defined in OMB Circular A-50) with the duties and responsibilities set forth in OMB Circular A-50, including to:

- Establish documented processes for audit follow-up, Resolution, and Corrective

---

<sup>1</sup> Policies and procedures for Contractor Audits are set forth below and in Appendix A.

<sup>2</sup> The CRO will be supported by the Privacy and Risk Management Office in the Office of the Director (PRMO).

## U.S. Office of Personnel Management Audit Response Policies and Procedures

Action.

- Ensure that timely responses are made to all audit reports as required by applicable law.
- Ensure that OPM renders a Management Decision with respect to each audit recommendation.
- Ensure that an Audit Recommendation Response (ARR) in the form set forth as Exhibit A hereto (as the same may be modified from time to time by the CRO in its discretion) is prepared and implemented for each audit recommendation.
- Ensure that OIG Semiannual Reports to Congress are sent to the OPM Director and, together with the OPM Director's response, to the appropriate committees and subcommittees of Congress, and made available to the public on a timely basis (see Policy 5 and related procedures for additional information).

OPM's RMC will exercise oversight of the audit response program, including:

- Reviewing and approving these audit response policies and any changes or amendments thereto recommended by the CRO.
  - Reviewing the status of open audit recommendations on a periodic basis.
  - On an annual basis, reviewing the effectiveness of OPM's audit response program (see Procedure 5.2 for additional information).
- 1.2. **Procedure:** The CRO shall monitor these audit response policies and procedures and their implementation and effectiveness and may from time to time in its discretion, amend, supplement, delete, or otherwise modify these audit response procedures as it deems appropriate to improve OPM's audit response program.<sup>3</sup>
- 1.3. **Procedure:** All audit notices will be forwarded by the recipient<sup>4</sup> to the CRO or its designee, who will be responsible for maintaining an Audit Tracker detailing all open audits, recommendations, and corrective actions. The CRO shall be responsible for notifying (i) the affected Office Head and (ii) the Office of the General Counsel of each audit.
- 1.4. **Procedure:** The affected Office Head will be responsible for identifying a senior official within the office to act as the Audit Response Manager with respect to each audit, who shall be

---

<sup>3</sup> Please note, however, that changes to audit response policies require the approval of the RMC (see Procedure 1.1).

<sup>4</sup> The Office of Legislative Affairs (OLA) acts as the primary recipient for GAO audits. The Audit Resolution and Compliance Group acts as the primary recipient for OIG Contractor Audits. The Privacy and Risk Management Office acts as the primary recipient for OIG Program Audits, IRS audits, NARA audits, and any other types of audits subject to these policies and procedures.

## U.S. Office of Personnel Management Audit Response Policies and Procedures

responsible for:

- Ensuring OPM’s timely cooperation with the auditor.
- Providing substantive responses to auditor information requests and obtaining appropriate review prior to transmission.
- Maintaining OPM’s working file of audit requests and responses thereto and transmitting final copies of the same to the CRO upon final completion of all corrective action.
- Serving as the primary point of contact with the auditor (or, in the case of GAO audits, with the Office of Legislative Affairs ((OLA), who serves as the primary point of contact with the GAO), CRO, and other interested OPM offices, such as the Office of General Counsel.
- Coordinating the preparation of an ARR with respect to each audit recommendation.
- Coordinating the preparation of OPM’s Audit Response Letter.
- Monitoring, and periodically notifying the CRO of, OPM’s progress on completing ARRs and identifying any risks in connection therewith.<sup>5</sup>

The Audit Response Manager shall update the CRO on the status of the audit at least monthly so that the CRO may update the Audit Tracker. The Audit Response Manager shall promptly notify the CRO of any disagreements between the Audit Response Manager and auditor that could delay, impede, or otherwise hinder the audit or OPM’s ability to timely perform its duties.

1.5. **Procedure:** The CRO will ensure that the current Audit Response Policies and Procedures are available to all OPM employees (including by posting on a shared webpage accessible to all OPM employees) and each Office Head will be responsible for ensuring that its employees are aware of and compliant therewith.

2. **Policy: OPM shall resolve OIG and GAO audit recommendations on a timely basis and within statutory deadlines.**

2.1. **Procedure:** With respect to OIG Audits:

2.1.1. The Audit Response Manager and CRO shall promptly notify each other of the receipt of an

---

<sup>5</sup> If multiple offices are involved, each affected office shall designate an Audit Response Manager and the CRO, after consultation with the Audit Response Managers, shall designate one of the Audit Response Managers to act as the “Lead Audit Response Manager” who shall be responsible for managing the audit response on behalf of OPM. Reference in this document to Audit Response Manager shall also be deemed to include the Lead Audit Response Manager, as applicable.

## **U.S. Office of Personnel Management Audit Response Policies and Procedures**

audit report from the OIG.

2.1.2. The Audit Response Manager shall be responsible for preparing (i) for each finding and recommendation set forth in the audit report, an ARR, and (ii) an Audit Response Letter to the OIG, in such form as the CRO shall approve from time to time.

2.1.2.1. The Audit Response Manager shall deliver to the CRO as soon as possible, but no later than 60 days from the audit report issuance date, a fully completed ARR for each finding and recommendation in the Audit Report.

2.1.2.2. The CRO shall provide its comments, if any, on an ARR within 10 days of delivery.

2.1.2.3. The Audit Response Manager shall deliver to the CRO a final copy of the ARRs and a draft Audit Response Letter to the OIG no later than 80 days after the audit report issuance date.

2.1.2.4. Upon approval of the CRO, the Audit Response Manager shall deliver the Audit Response Letter to the OIG no later than 90 days from the audit report issuance date, with a bcc to the CRO.

2.1.2.5. If the OIG notifies the Audit Response Manager that it disagrees with any non or partial concurrence in the Audit Response Letter, the Audit Response Manager and the CRO shall work collaboratively and diligently with the OIG to reach a satisfactory agreement. If the CRO determines that a satisfactory agreement cannot be reached, the CRO shall issue in writing, and shall inform the OIG of, OPM's final Management Decision no later than the sixth month anniversary of the audit report issuance date.

2.2. **Procedure:** With respect to GAO Audits:

2.2.1. OLA shall promptly notify the CRO and the Audit Response Manager of the receipt of a draft audit report from the GAO.

2.2.2. The Audit Response Manager shall be responsible for reviewing the factual statements in each draft audit report and confirming whether any changes or corrections are required.

2.2.2.1. The Audit Response Manager shall deliver to the CRO as soon as possible, but no later than 10 days prior to the deadline for responding to the draft audit report, a draft response letter setting forth any comments to the factual statements set forth in the draft audit report.

2.2.2.2. The CRO shall provide its comments, if any, on the draft response letter no later than 5 days after delivery thereof.

2.2.2.3. Upon approval of the CRO, and OGC, the Audit Response Manager shall deliver the response letter to the OLA, who shall deliver the same to the GAO, on or before the

## **U.S. Office of Personnel Management Audit Response Policies and Procedures**

applicable deadline, with a bcc to the CRO.

2.2.3. The OLA shall promptly notify the CRO and the Audit Response Manager upon receipt of the final audit report.

2.2.4. The Audit Response Manager shall be responsible for preparing (i) an ARR for each finding and recommendation set forth in the audit report and (ii) an Audit Response Letter to the GAO in such form as the CRO shall approve from time to time. Responses are subject to advance coordination with or clearance with OMB when:

- The statement expresses views on proposed or pending legislation. See Circular A-19, "Legislative coordination and clearance."
- The statement indicates a violation of law.
- The statement discusses matters under the purview of other agencies or executive branch budget policies.
- Requested by OMB.

The Audit Response Manager shall notify the CRO and OLA as soon as possible after determining whether any of these conditions may apply.

The OPM Director is required to submit a statement to the Director of OMB within 180 days after the transmittal of a GAO Report when any of the following apply:

- The report contains a specific recommendation for the OPM Director.
- The report contains financial statements accompanied by either a qualified or adverse audit opinion or a disclaimer of opinion.
- The report indicates a potential violation of the Antideficiency Act, which has not been reported to the appropriate authorities.
- The report indicates a potential violation of other laws.
- When requested by OMB

The Audit Response Manager shall notify the CRO and OLA as soon as possible after determining whether any of these conditions may apply.

2.2.4.1. The Audit Response Manager shall deliver to the CRO as soon as possible, but no later than 60 days from the audit report issuance date, a fully completed ARR for each finding and recommendation in the audit report.

## U.S. Office of Personnel Management Audit Response Policies and Procedures

- 2.2.4.2. The CRO shall provide its comments, if any, on an ARR within 10 days of delivery.
- 2.2.4.3. The Audit Response Manager shall deliver to the CRO a final copy of the ARRs and a draft Audit Response Letter to the GAO, in such form as the CRO shall approve from time to time, no later than 80 days after the audit report Issuance date.
- 2.2.4.4. Upon approval of the CRO, OGC and OLA, the Audit Response Manager shall submit the Audit Response Letter and appropriate transmittal letters, in such form as the CRO shall approve from time to time,<sup>6</sup> for any additional official clearance and approval (if required) and OLA distribution no later than 90 days from the Audit Report Issuance Date, with a bcc to the CRO.
- 2.2.4.5. If the GAO notifies the Audit Response Manager that it disagrees with any non or partial concurrence in the Audit Response Letter, the Audit Response Manager and the CRO shall work collaboratively and diligently with the GAO to reach a satisfactory agreement. If the CRO determines that a satisfactory agreement cannot be reached, the CRO shall issue in writing, and shall provide to OLA for transmission to the GAO, OPM's final Management Decision no later than the sixth month anniversary of the audit report issuance date.

**3. Policy: OPM shall implement corrective action for audit recommendations in which it concurs. Corrective action is required to be completed with respect to OIG recommendations with which OPM concurs (in whole or part) within 12 months of the date of the report.<sup>7</sup> As a general matter OPM expects corrective action with respect to GAO recommendations with which OPM concurs (in whole or part) to be completed within 12 months from the date of the report as well.**

- 3.1. **Procedure:** Audit Response Managers shall be responsible for monitoring the progress of corrective action.
- 3.2. **Procedure:** The CRO shall maintain the Audit Tracker, which shall be updated periodically based on reporting from the Audit Response Managers.
- 3.3. **Procedure:** Audit Response Managers shall provide the CRO with a Certificate of Completion of Corrective Action in the form set forth as Exhibit B hereto (as the same may be modified from time to time by the CRO in its discretion) promptly upon the completion of Corrective

---

<sup>6</sup> Transmittal shall be made to:

- 1. The Senate Committee on Homeland Security and Governmental Affairs and the Subcommittee on Boarder Management, Federal Workforce, and Regulatory Affairs.
- 2. The Senate Committee on Appropriations and the Subcommittee on Financial Services and General Government.
- 3. The House Committee on Oversight and Governmental Reform and the Subcommittee on Government Operations.
- 4. The House Committee on Appropriations and the Subcommittee on Financial Services and General Government.

<sup>7</sup> Pub. L. 103-355 title VI, §6009, Oct 13, 1994, as amended.

## U.S. Office of Personnel Management Audit Response Policies and Procedures

Action on an open audit recommendation.

- 3.4. **Procedure:** Each Audit Response Manager with unfinished Corrective Action shall provide an update thereon (including any updated risks) to the CRO not later than 30 days prior to each quarter end.
- 3.5. **Procedure:** The CRO will report to the RMC on audit responses quarterly, and shall provide additional information, including presentations by Audit Response Managers, Office Heads, or other responsible individuals, as the RMC may request from time to time.
4. **Policy: OPM shall work with auditor to formally close audit recommendations as promptly as possible.**
  - 4.1. **Procedure:** Upon completion of Corrective Action (and the delivery of a Certificate of Completion of Corrective Action to the CRO as provide for in Procedure 3.3), the Audit Response Manager shall notify the auditor thereof as promptly as possible (with either directly or through the OLA, in the case of a GAO audit) and shall provide such additional information as the auditor may request to formally close out the recommendation.
  - 4.2. **Procedure:** The Audit Response Manager shall promptly notify the CRO of the auditor's determination to formally close a recommendation; and the CRO shall update the Audit Tracker to reflect the same.
  - 4.3. **Procedure:** The Audit Response Manager shall promptly notify the CRO if it is unable to cause the auditor to formally close a recommendation for which the Audit Response Manager believes all necessary Corrective Action has been completed.
5. **Policy: OPM shall respond to OIG Periodic Reports to Congress within statutory deadlines. The OPM OIG makes a semi-annual report to Congress for reporting periods October 1 through March 31 and April 1 through September 30. The former must be delivered to the OPM Director not later than April 30 and the later by October 31, and the OPM Director must deliver such report, together with the OPM Director's response thereto, to the Congress within 30 days of receipt.<sup>8</sup> The Director must also make copies of the OIG report available to the public upon request and at reasonable cost within 60 days of its transmission to Congress.<sup>9</sup>**
  - 5.1. **Procedure:** The CRO will coordinate preparation of the Agency Response to the OIG Semiannual report in accordance with the Standard Operating Procedures set forth in Exhibit C hereto (as the same may be modified from time to time by the CRO in its discretion).
6. **Policy: OPM shall review its audit response program on an annual basis.**
  - 6.1. **Procedure:** The CRO will conduct an annual assessment of the audit response program and

---

<sup>8</sup> See 5 USC §405(c).

<sup>9</sup> See 5 USC §405(c) and (d).

## U.S. Office of Personnel Management Audit Response Policies and Procedures

present the results thereof to the RMC during each Q4. Such assessment shall include the following elements:

- An update on current audit activity, including audits opened, audit recommendations received, audit recommendations resolved (including the applicable Management Decision) and Corrective Actions completed during the current year.
- A review and assessment of the effectiveness of OPM’s audit response program, including the performance of Audit Response Managers.
- Proposed changes to the audit response program (if any).

6.2. **Procedure:** The RMC will review the aforementioned audit response program assessment and recommendations and respond to the same no later than the end of Q4.

### Healthcare and Insurance Contractor Audits

The Inspector General Act of 1978 transferred to the OIG the oversight responsibilities previously undertaken by OPM’s Insurance Audits Division, Retirement and Insurance Group. In exercising this responsibility, the OIG audits insurance carriers and contractors who contract with OPM in administering employee benefits. For these audits, the contractor being audited is responsible for responding to findings and recommendations directed to the Healthcare and Insurance (HI) contractor. With respect to these recommendations, the Associate Director, HI is the Agency Follow-up Official and the Contracting Officer for the specific HI contract is the management official responsible for deciding whether Corrective Actions by the HI contractor are necessary and whether the Corrective Actions taken by the HI contractor are sufficient. The policies and procedures for resolution of HI contractor audits (as the same may be modified from time to time by the Associate Director, HI in its discretion) are attached hereto as Appendix A.

### Roles and Responsibilities

|  |  |
|--|--|
| <b>Audit Resolution and Compliance, HI</b> | Responsible for day-to-day management of the audit follow-up and resolution process for Healthcare and Insurance Contractor Audits.  |
| <b>Audit Response Managers</b>             | Will be designated for by the applicable Office Head for each Program Audit and will be responsible for coordinating and overseeing OPM’s response to such Program Audit, including: <ul style="list-style-type: none"> <li>• Ensuring OPM’s timely cooperation with the auditor.</li> <li>• Maintaining OPM’s records of audit requests and responses thereto.</li> </ul> |

## U.S. Office of Personnel Management Audit Response Policies and Procedures

|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>• Serving as the primary point of contact with the auditor and CRO.</li> <li>• Preparing an ARR with respect to each audit recommendation.</li> <li>• Preparing OPM’s Audit Response Letter.</li> <li>• Monitoring OPM’s progress on completing the ARR and periodically notifying the CRO of progress thereon.</li> </ul>  |
| <p><b>Chief Risk Officer</b></p>        | <p>Responsible for day-to-day management of OPM’s audit response program, including acting as the Agency Follow-Up Official for Program Audits, with the responsibility and authority to:</p> <ul style="list-style-type: none"> <li>• Establish documented processes for audit follow-up, Resolution, and Corrective Action.</li> <li>• Ensure that timely responses are made to all audit reports.</li> <li>• Ensure that OPM renders a Management Decision with respect to each audit recommendation, including making final Managerial Decisions for Program Audits when the auditor, on the one hand, and Audit Response Manager and CRO, on the other hand, cannot agree on a mutually satisfactory Managerial Decision.</li> <li>• Ensure that an ARR is prepared and implemented for each audit recommendation.</li> <li>• Ensure that OIG Semiannual Reports to Congress are sent to the OPM Director and, together with the OPM Director’s response, the appropriate committees and subcommittees of Congress, and made available to the public on a timely basis (see <a href="#">Policy 5</a> and related procedures for additional information).</li> </ul> <p>The CRO is authorized to, from time to time in its discretion, amend, supplement, delete, or otherwise modify the audit response procedures as it deems appropriate to improve OPM’s audit response program. The CRO will be supported by the Privacy and Risk Management Office in the Office of the Director (<a href="#">PRMO</a>).</p> |
| <p><b>Contracting Officers (HI)</b></p> | <p>Responsible for deciding whether Corrective Actions by an insurance carrier or contractor are necessary and whether the Corrective Actions taken by an insurance carrier or contractor are sufficient in response to Healthcare and Insurance Contractor Audits.</p>  |
| <p><b>Office Heads</b></p>              | <p>Responsible for (i) ensuring full cooperation of their offices with audits, (ii) implementing Corrective Action, and (iii) designating, with respect to each program audit, the office’s Audit Response Manager.</p> <p>The Associate Director, HI acts as the Agency Follow-up Official for Healthcare and insurance Contractor Audits.</p>  |

## U.S. Office of Personnel Management Audit Response Policies and Procedures

|                                      |  |
|--------------------------------------|--|
| <b>Office of Legislative Affairs</b> | Responsible for communications with the GAO in connection with GAO Program Audits.   |
| <b>OPM Director</b>                  | Responsible for: <ul style="list-style-type: none"> <li>• Designating a top management official to oversee audit, inspection, and evaluation follow-up, including resolution and Corrective Action.</li> <li>• Communicating with the audit organization on agency progress toward, and completion of, resolution and Corrective Action.</li> <li>• Assuring that management officials throughout OPM understand the value of the audit, inspection, or evaluation process and are responsive to any resulting recommendations.</li> </ul> |
| <b>Risk Management Council</b>       | Oversee the Audit Response Program, including: <ul style="list-style-type: none"> <li>• Reviewing and approving these audit response policies and any changes or amendments thereto recommended by the CRO.</li> <li>• Reviewing the status of open audit recommendations on a periodic basis.</li> <li>• On an annual basis, reviewing the effectiveness of OPM’s Audit Response program (see <a href="#">Procedure 5.2</a> for additional information).</li> </ul>   |

### Definitions

|                              |   |
|------------------------------|---|
| <b>Audit Response Letter</b> | Written response by OPM to an audit report indicating agreement (i.e., concurrence), partial agreement (i.e. partially concurrence), or disagreement (i.e., nonconcurrence) with reported findings and recommendations. Comments indicating agreement with recommendations must include planned Corrective Actions, where appropriate, and dates for achieving actions. Comments indicating disagreement or partial disagreement must explain the reasons for disagreement. Where disagreement is based on interpretation of law, regulation, or the authority of officials to take or not to take action, the response must include the legal basis. |
| <b>Corrective Action</b>     | Measures taken to implement resolved audit findings and recommendations.  |
| <b>Management Decision</b>   | OPM management’s final decision concerning its response to audit findings and recommendations, including any corrective actions it concludes are necessary.   |
| <b>Resolution, Resolve</b>   | Means the point at which the auditor and OPM management agree on Corrective Action(s) to be taken on reported findings and recommendations or, in the event of disagreement, the point at which the agency renders a management decision. For GAO recommendations, the recommendation is considered resolved at the point at which the agency responds to Congress and GAO, as required by 31 U.S.C. § 720(b).  |

**U.S. Office of Personnel Management  
Audit Response Policies and Procedures**

Exhibit A  
Audit Recommendation Response

[See accompanying Word document]

**U.S. Office of Personnel Management  
Audit Response Policies and Procedures**

Exhibit B  
Certificate of Completion of Corrective Action

[See accompanying Word document]

**U.S. Office of Personnel Management  
Audit Response Policies and Procedures**

Exhibit C

Agency Response to OIG Semiannual Report to Congress: Standard  
Operating Procedures

[See accompanying Word document]

# U.S. Office of Personnel Management Audit Response Policies and Procedures

## Appendix A HI Contractor Audit Resolution and Follow-Up Policies and Procedures

Healthcare and Insurance (HI), Audit Resolution and Compliance (ARC) shall be responsible for the day-to-day management of the follow-up and resolution process for HI contractor audits, including acting as the agent of the Contracting Officer (CO), who is the deciding official for findings and recommendations directed to HI contractors as well as corrective action plans received from contractors.

**1. Policy: HI is committed to fully cooperating with the Office of Inspector General (OIG) as they fulfill their statutory audit mandates.**

1.1. **Procedure:** The Associate Director, HI shall be designated as the Agency Follow-Up Official (as such term is defined in OMB Circular A-50) for all HI contractor audits with the duties and responsibilities set forth in OMB Circular A-50, including to:

- Establish documented processes for audit follow-up, Resolution, and Monitoring of Corrective Actions;
- Follow up with HI contractors requesting timely responses to all audit reports as required by applicable law;
- Follow up with OIG to reach concurrence with regard to all corrective actions taken by HI contractors;
- Ensure that Contracting Officers render a Management Decision with respect to each audit recommendation directed to an HI contractor or the Contracting Officer relating to the performance of the HI contractor;
- Coordinate with OPM's Chief Risk Officer for each audit recommendation directed to OPM or OPM HI; and
- Ensure that Corrective Action plans are prepared and implemented for each audit recommendation where full correction cannot be accomplished within 180 days.

1.2. **Procedure:** ARC will support the Associate Director, HI by handling the day-to-day follow-up on OIG recommendations. ARC will prioritize the resolution of HI contractor audit recommendations and monitor corrective actions by HI contractors, consulting internal and external stakeholders as necessary, to seek resolution or closure of all recommendations within 180 days following issuance of the final audit report.

1.3. **Procedure:** ARC will provide expert analysis and evaluation of the OIG findings and recommendations, the HI contractor's responses, and any evidence submitted by the HI contractor to facilitate evaluation, resolution, and closure of recommendations. ARC will

## **U.S. Office of Personnel Management Audit Response Policies and Procedures**

coordinate all formal and informal communications between the CO, the HI contractor, and other interested OPM parties during the audit resolution process in accordance with ARC's documented process, including, but not limited to:

- Preparing the Transmittal Letter and any Resolution Letters;
- Receiving and maintaining HI contractor responses and evidence;
- Coordinating with the OIG, Office of General Counsel, Office of the Actuaries, HI subject matter experts (SMEs), Office of the Chief Financial Officer, COs, senior HI leadership, and other stakeholders as necessary to evaluate HI contractor responses and evidence;
- Notifying the CRO and OLA if there is a substantial chance that the audit will result in media attention that may result in inquiries from one or more members of Congress;
- Ensuring that resolution actions are consistent with all applicable laws, regulations, administrative policies, and OPM contracts;
- Providing analysis, options, cost benefit analyses, and recommendations to the Contracting Officer;
- Providing draft language for Resolution Letters communicating the determinations of the Contracting Officer; and
- Providing draft language for Contracting Officer's Final Decisions.

1.4. **Procedure:** ARC will track all HI contractor audits and recommendations, including the status of each recommendation, any questioned amounts, determined amounts and recovered amounts. In accordance with ARC's document process, ARC will maintain records of the status of all OIG recommendations made to HI contractors, including:

- Records will be reviewed periodically with the OIG and with OPM's Chief Risk Officer to ensure that all parties' records are consistent with regard to the status of all recommendations.
- ARC will provide all necessary data and information to OPM's Chief Risk Officer to ensure complete and accurate reporting for all required semi-annual reports.

2. **Policy:** ARC is committed to fully cooperating with the Government Accountability Office (GAO) as they fulfill their statutory audit mandates and with OPM's Chief Risk Officer to prioritize the resolution of GAO engagements.

2.1. **Procedure:** For GAO Engagements, ARC shall be the designated point of contact for the applicable Audit Response Manager. Consistent with its documented procedures, ARC shall:

## **U.S. Office of Personnel Management Audit Response Policies and Procedures**

- Coordinate with relevant SMEs in HI to provide timely and thorough responses and records to the Audit Response Manager with respect to all:
  - Inquiries and requests for information;
  - Request for responses and comments with regard to any findings or recommendations; and
  - Development of any corrective action plans for HI program offices.
- Maintain records of the status of all GAO recommendations made to HI, including:
  - Records will be reviewed periodically with OPM's Chief Risk Officer to ensure that all parties' records are consistent with regard to the status of all recommendations.
  - ARC will provide all necessary data and information to OPM's Chief Risk Officer to ensure complete and accurate reporting for all required semi-annual reports.