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Office of Inspector General
United States Department of State

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Office of Audits

April 2025

Audit of U.S. Agency for Global Media FY 2024 Compliance With Payment Integrity Requirements

FINANCIAL MANAGEMENT DIVISION

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

AUD-FM-IB-25-17

What OIG Audited

In FY 2024, improper and unknown federal payments government-wide totaled approximately \$162 billion. The Payment Integrity Information Act of 2019 (PIIA) requires Inspectors General to annually determine whether agencies complied with the act and establishes requirements for agencies that are deemed noncompliant.

The Office of Inspector General (OIG) conducted this audit to determine whether the U.S. Agency for Global Media (USAGM) complied with PIIA for FY 2024. As part of this objective, OIG also evaluated USAGM's efforts to prevent and reduce improper and unknown payments.

What OIG Recommends

OIG concluded that USAGM complied with payment integrity requirements for FY 2024; therefore, OIG is not offering any recommendations. USAGM's response to a draft of this report is reprinted in its entirety in Appendix B.

April 2025

OFFICE OF AUDITS

FINANCIAL MANAGEMENT DIVISION

Audit of U.S. Agency for Global Media FY 2024

Compliance With Payment Integrity Requirements

What OIG Found

For the FY 2024 reporting period, OIG found that USAGM complied with payment integrity requirements, as presented in Table 1.

Table 1: Compliance With PIIA Criteria

Payment Integrity Criteria	Compliance
Published payment integrity information with the annual financial statement and in accompanying materials.	Yes
Posted the annual financial statement and accompanying materials on the agency website.	Yes
Conducted risk assessments.	Yes
Concluded whether each program is likely to make improper and unknown payments above or below the statutory threshold.	Yes
Published improper and unknown payment estimates.*	N/A
Published corrective action plans.*	N/A
Published reduction targets.*	N/A
Demonstrated improvements to payment integrity or reached a tolerable rate.*	N/A
Developed a plan to meet reduction target.*	N/A
Reported estimate less than 10 percent for each program with a published estimate.*	N/A

*Criterion did not apply because no program was determined to be at significant risk for improper payments.

Source: Prepared by OIG using criteria from Office of Management and Budget Circular A-123, Appendix C.

OIG found that USAGM published the FY 2024 financial statement and accompanying materials, which included all applicable payment integrity information, on its website. USAGM also conducted program-specific risk assessments and made appropriate conclusions related to those risk assessments. OIG found that USAGM complied with PIIA requirements for the programs subject to risk assessments during FY 2024. These programs are presented in Tables 1 and 2 in the Audit Results section of this report.

During the evaluation of USAGM's efforts to prevent and reduce improper payments, OIG did not identify any needed improvements involving improper and unknown payments determination, the associated estimation methodology, or actions necessary to improve prevention and reduction.

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OBJECTIVE

The Office of Inspector General (OIG) conducted this audit to determine whether the U.S. Agency for Global Media (USAGM) complied with the Payment Integrity Information Act of 2019 (PIIA)¹ for FY 2024. As part of this objective, OIG also evaluated USAGM's efforts to prevent and reduce improper and unknown payments.

BACKGROUND

According to the Department of the Treasury, improper and unknown federal payments government-wide totaled approximately \$162 billion in FY 2024.² Improper payments are payments that were made in an incorrect amount under statutory, contractual, administrative, or other legally applicable requirements. The term "improper payments" includes the following types of payments:

- Payment to an ineligible recipient.
- Payment for an ineligible good or service.
- Duplicate payments.
- Payments for goods or services not received (except for such payments authorized by law).
- Payments that do not account for credit for applicable discounts.³

If a program cannot discern whether a payment is proper or improper, the payment is considered an unknown payment. If a program is still conducting research or reviewing a payment at the time that the program must finish its sampling and report its results, the payment will be considered an unknown payment for reporting purposes that year. This is done so that the program does not unintentionally over or under report the payment type results.⁴

The federal government has taken steps to identify and reduce improper payments. For example, on March 2, 2020, Congress enacted PIIA, which sets forth improper payment reporting requirements, including an annual compliance report from OIGs.⁵ PIIA requires

¹ Payment Integrity Information Act of 2019 (PIIA), Public Law 116-117, March 2, 2020, codified at 31 United States Code Chapter 33, Subchapter IV, "Improper Payments."

² PaymentAccuracy.gov, The Numbers, Annual Improper Payment Datasets, 2024 Dataset, <https://www.paymentaccuracy.gov/>.

³ Office of Management and Budget Circular No. A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control," Appendix C, "Requirements for Payment Integrity Improvement," § VIII. "Appendix 1A: Definitions for Purposes of this Guidance," page 64 (March 5, 2021).

⁴ Ibid., page 12.

⁵ PIIA, § 3353.

agencies to publish improper and unknown payments information with the agency's financial statements and in accompanying materials and post the information on the agency's website.⁶

On March 5, 2021, the Office of Management and Budget (OMB) updated guidance for agencies to implement improper payment legislation in Appendix C, "Requirements for Payment Integrity Improvement," of OMB Circular A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control." These updates were made in an effort to

transform the payment integrity compliance framework and create a more comprehensive and meaningful set of requirements to allow agencies to spend less time complying with low-value activities and more time researching the underlying causes of improper payments, balancing payment integrity risks and controls, and building the capacity to help prevent future improper payments.⁷

USAGM Mission and Organization

During the period of audit fieldwork, USAGM, an independent federal agency, supervised all U.S. government-supported civilian international broadcasting as part of its mission to inform, engage, and connect people around the world in support of freedom and democracy. The USAGM federal broadcasting organizations were the Voice of America and the Office of Cuba Broadcasting. USAGM also oversaw five grantee organizations: Radio Free Europe/Radio Liberty, Middle East Broadcasting Networks, Radio Free Asia, the Open Technology Fund, and the Frontline Media Fund. The five grantees received funding from the federal government but were organized and managed as private, nonprofit corporations.

USAGM's Chief Financial Officer served as USAGM's principal financial and budget officer. The Chief Financial Officer was responsible for, among other things, overseeing all financial management activities relating to USAGM programs and operations and establishing effective financial management policies and management controls.

Within the Office of the Chief Financial Officer, the Office of Financial Operations was responsible for the daily performance of financial operations, accuracy of financial management records, prompt processing of payments, collection of accounts receivable, and facilitation of USAGM's annual financial statement audit. In FY 2024, USAGM made some purchases and payments to overseas vendors. The Department of State also made payments to

⁶ OMB Circular A-123, Appendix C, § VI.A, "Achieving and Evaluating Compliance (Agency and OIG Responsibilities)," page 43.

⁷ OMB Memorandum M-21-19, "Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement" (March 5, 2021).

overseas vendors on behalf of USAGM. During FY 2024, USAGM reported outlays⁸ totaling approximately \$884 million.

AUDIT RESULTS

Finding A: USAGM Complied With PIIA Requirements

OIG found that USAGM complied with all applicable PIIA requirements for FY 2024. Specifically, USAGM:

- Published payment integrity information with the annual financial statement and in the accompanying materials to the annual financial statement.
- Posted the annual financial statement, including a link to the accompanying materials, on the agency website.
- Conducted improper payment risk assessments for required programs.
- Adequately concluded whether each program is likely to make improper and unknown payments above or below statutory thresholds.

USAGM was not required to perform additional procedures or make other disclosures because it did not identify any programs at significant risk for improper and unknown payments. Table 1 details whether selected programs were compliant with required criteria.

⁸ According to the Government Accountability Office, *A Glossary of Terms Used in the Federal Budget Process* (GAO-05-734SP, September 2005), page 73, outlays include the issuance of checks, the disbursement of cash, or the electronic transfer of funds made to liquidate a federal obligation.

Table 1: PIIA Compliance Reporting for Selected Programs

Program Name	Criterion 1a ^a	Criterion 1b ^b	Criterion 2a ^c	Criterion 2b ^d	Criterion 3 ^e	Criterion 4 ^f	Criterion 5a ^g	Criterion 5b ^h	Criterion 5c ⁱ	Criterion 6 ^j
International Broadcasting Bureau	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Radio Free Europe/Radio Liberty	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Middle East Broadcasting Networks	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A

^a Published payment integrity information with the annual financial statement and in accompanying materials to the annual financial statement.

^b Posted the annual financial statement and accompanying materials on the agency website.

^c Conducted improper payment risk assessments for each program with annual outlays greater than \$10,000,000 at least once in the last 3 years.

^d Adequately concluded whether the program is likely to make improper and unknown payments above or below the statutory threshold.

^e Published improper and unknown payment estimates for programs susceptible to significant improper and unknown payments in the accompanying materials to the annual financial statement.

^f Published corrective action plans for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement.

^g Published an improper and unknown payment reduction target for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement.

^h Demonstrated improvements to payment integrity or reached a tolerable improper and unknown payment rate.

ⁱ Developed a plan to meet the improper and unknown payment reduction target.

^j Reported an improper and unknown payment estimate of less than 10 percent for each program for which an estimate was published in the accompanying materials to the annual financial statement.

Source: Generated by OIG based on criteria obtained from OMB Circular A-123, Appendix C, pages 43–49.

Regarding USAGM’s efforts to prevent and reduce improper and unknown payments, including USAGM’s improper and unknown payments determination and associated estimation methodology, OIG did not identify any needed improvements or necessary actions.

USAGM Published Annual Financial Statement and Accompanying Materials

PIIA requires agencies to “[publish payment integrity] information with the annual financial statement” and post the annual financial statement and any accompanying materials on the agency website.⁹ OMB Circular A-123, Appendix C, states that agencies should consult OMB Circular A-136 annually to determine which of the Payment Integrity reporting requirements

⁹ OMB Circular A-123, Appendix C, § VI.A, page 43.

apply to the agency.¹⁰ At a minimum, all agencies with programs in Phase 1¹¹ and Phase 2¹² are required to provide a link to [paymentaccuracy.gov](https://www.paymentaccuracy.gov) in their Agency Financial Report or Performance and Accountability Report so the reader can access information about agency improper payment risk assessments, recoveries, and other agency-wide reporting requirements.¹³

USAGM published its FY 2024 financial statements and accompanying materials containing the required improper payments information and posted the financial statement, which included a link to the accompanying materials, on its agency website.¹⁴ Specifically, in the financial statement, USAGM included a link to [paymentaccuracy.gov](https://www.paymentaccuracy.gov), which contains information related to improper payments, including the amounts of recovered overpayments and “Do Not Pay” initiative activities.¹⁵ Because USAGM did not identify any programs that were deemed susceptible to significant improper payments, additional reporting requirements were not applicable.

USAGM Performed Program Risk Assessments

PIIA requires agencies to periodically review all programs and identify those with outlays exceeding a certain amount that may be susceptible to significant improper payments.¹⁶ OMB Circular A-123, Appendix C, defines significant improper payments as annual improper and unknown payments in a program exceeding (1) both 1.5 percent of program outlays and \$10 million of all program payments made during the fiscal year or (2) \$100 million.¹⁷ Agencies should perform a risk assessment, which can be either quantitative or qualitative.¹⁸ Quantitative risk assessments focus on measurable and often predefined data.¹⁹ Qualitative risk assessments consider relevant risk factors using a predefined scale that would help prove that

¹⁰ OMB Circular A-123, Appendix C, § VII.A, “Reporting Requirements for All agencies,” page 56; and OMB Circular A-136, “Financial Reporting Requirements,” § II.4.5, “Payment Integrity Information Act Reporting” (May 30, 2024).

¹¹ According to OMB Circular A-123, Appendix C, page 69, Phase 1 is the first of two stages in the process of review for improper payments and unknown payments. During this stage, an improper payment risk assessment is conducted at least once every 3 years to determine whether a program is likely to be susceptible to significant improper payments and unknown payments.

¹² According to OMB Circular A-123, Appendix C, page 69, Phase 2 is the second of two stages in the process of review for improper payments and unknown payments. During this stage, a program will use a statistically valid sampling and estimation methodology to report an annual improper payment and unknown payment estimate. Phase 2 is not required if the results of Phase 1 indicate that the program is not likely to be susceptible to significant improper payments and unknown payments.

¹³ *Ibid.*, page 56.

¹⁴ USAGM, *FY 2024 Agency Financial Report* (November 15, 2024), <https://www.usagm.gov/wp-content/uploads/2024/11/FY-2024-AFR-USAGM.pdf>.

¹⁵ “Do Not Pay” is a government initiative that allows agencies to use a secure online interface to check various data sources to verify the eligibility of a vendor, grantee, loan recipient, or beneficiary to receive federal payments.

¹⁶ 31 United States Code § 3352(a)(1).

¹⁷ OMB Circular A-123, Appendix C, § VIII, pages 73–74.

¹⁸ *Ibid.*, page 14.

¹⁹ *Ibid.*, page 71.

the program is likely to be above or below the statutory threshold.²⁰ Risks are scored based on their likelihood of occurring and the impact on improper and unknown payments should they occur.²¹

If an agency initially determines that programs are not susceptible to significant improper payments, OMB requires the agency to implement a systematic method to conduct risk assessments of programs with outlays above \$10 million at least once every 3 years thereafter. If a program that is on a 3-year risk assessment cycle experiences a significant change in legislation or significant increases in funding, the agency may need to reassess the program’s risk susceptibility during the annual cycle, even if it is less than 3 years from the previous risk assessment.²²

During FY 2024, USAGM performed a quantitative risk assessment²³ for its programs in accordance with its 3-year rotational testing approach. Specifically, USAGM performed quantitative risk assessment testing of the International Broadcasting Bureau, Radio Free Europe/Radio Liberty, and Middle East Broadcasting Networks. To perform this analysis, USAGM tested a sample of expenditures for the three programs, as shown in Table 2.

Table 2: Results of USAGM Program Testing

Program	Number (Amount) of Payments	Number (Amount) Tested	Number (Amount) of Improper Payments	Error Rate
International Broadcasting Bureau	1,409 (\$17,079,047)	47 (\$4,295,782)	0 (\$0)	0.00
Radio Free Europe/Radio Liberty	36 (\$170,295,900)	36 (\$170,295,900)	0 (\$0)	0.00
Middle East Broadcasting Networks	12 (\$112,370,432)	12 (\$112,370,432)	0 (\$0)	0.00

Source: Prepared by OIG using payment integrity testing data provided by USAGM.

USAGM’s quantitative risk assessments did not identify any improper payments during testing of the three programs for FY 2024. OIG reviewed the three risk assessments and determined that USAGM performed risk assessments in compliance with its policies and that the risk assessments adequately concluded whether the programs were likely to make improper and unknown payments above or below the statutory threshold.

²⁰ Ibid., pages 14–15, 71.

²¹ Ibid., page 71.

²² Ibid., pages 14–15.

²³ USAGM, “Processes for Monitoring Improper Payments,” page 2 (June 2024).

USAGM Efforts To Prevent and Reduce Improper and Unknown Payments

OIG evaluated USAGM's efforts to prevent and reduce improper and unknown payments. Through inquiries with USAGM staff and review of USAGM policies and procedures and responses to the OMB data call, OIG found that USAGM was performing procedures to detect and recover improper payments. Specifically, USAGM was following its policies and procedures that state when improper payments are discovered that result in monetary loss to the government, USAGM must take steps to recover the funds, such as contacting the vendor or employee to explain that an improper payment was made and request that the funds be returned to USAGM. Furthermore, USAGM can use the Department of the Treasury Offset Program to collect overpayments if needed.

In addition, USAGM uses resources such as the Department of the Treasury's Do Not Pay Initiative and the General Services Administration's System for Award Management²⁴ to reduce improper payments prior to making a payment or award. USAGM employees are required to review pre-payment and pre-award procedures and ensure that a thorough review of available databases with relevant information on eligibility occurs before the release of any federal funds, to the extent permitted by law.

Furthermore, USAGM implemented its Enterprise Risk Management Framework. Specifically, according to a USAGM official, USAGM documented and implemented risk response mitigation strategies to identify enterprise risks, including evaluating fraud risk, documenting controls in place, and mitigating activities. Additionally, a USAGM official indicated that USAGM uses a risk-based approach to design and implement financial and administrative controls.

²⁴ The System for Award Management is operated by the General Services Administration. Entities must have an active registration in the system to do business with the federal government.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Payment Integrity Information Act of 2019 (PIIA)¹ requires the Office of Inspector General (OIG) to provide an annual report of U.S. Agency for Global Media (USAGM) compliance with improper payments requirements.² In accordance with the PIIA requirement, OIG conducted this audit to determine whether USAGM complied with PIIA for FY 2024. As part of this objective, OIG also evaluated USAGM's efforts to prevent and reduce improper and unknown payments.

OIG conducted this audit from January to March 2025 in the Washington, DC, metropolitan area. The scope of this audit was USAGM's FY 2024 payment integrity reporting process. OIG conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

To obtain background information, OIG reviewed legislative requirements related to payment integrity and Office of Management and Budget (OMB) guidance. In addition, OIG reviewed and analyzed prior OIG audit work to identify information relating to previously reported payment integrity issues.

During the audit, OIG determined whether USAGM (1) published payment integrity information with the annual financial statement and in the accompanying materials to the annual financial statement, (2) posted the annual financial statement, including a link to the accompanying materials, on the agency website, (3) conducted improper payment risk assessments for required programs, and (4) adequately concluded whether each program is likely to make improper and unknown payments above or below the statutory thresholds.³ In addition, OIG reviewed and assessed policies and procedures and made inquiries with USAGM officials to gain an understanding of USAGM's processes for reporting payment integrity information on its website, performing risk assessments, and identifying improper payments. OIG also obtained and reviewed documentation supporting the quantitative risk assessment testing that USAGM performed and reviewed the payment integrity information disclosed in the FY 2024 financial statement and accompanying materials for completeness and accuracy.

¹ Payment Integrity Information Act of 2019 (PIIA), Public Law 116-117, March 2, 2020, codified at 31 United States Code Chapter 33, Subchapter IV, "Improper Payments."

² 31 United States Code § 3353.

³ Office of Management and Budget Circular No. A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control," Appendix C, "Requirements for Payment Integrity Improvement," pages 43-44 (March 5, 2021).

Data Reliability

OIG obtained computer-processed data, such as worksheets, to aid in determining whether USAGM complied with PIIA. More specifically, the data provided evidence that USAGM took steps to comply with PIIA. OIG performed tests to validate the completeness and accuracy of amounts on supporting worksheets that were used to report information on paymentaccuracy.gov. OIG determined that the data were sufficiently reliable for the purposes of its audit objective. OIG did not perform tests to validate the worksheet amounts to the underlying financial management system because such testing was not necessary to accomplish the objective of this audit.

Work Related to Internal Control

During the audit, OIG considered a number of factors, including the subject matter of the project, to determine whether internal control was significant to the audit objective. Based on its consideration, OIG determined that internal control was not significant to the audit objective of determining whether USAGM complied with PIIA for FY 2024. Nonetheless, OIG performed procedures to gain an understanding of internal controls related to USAGM's payment integrity review and reporting processes. Specifically, OIG prepared a questionnaire and administered it to USAGM officials to update OIG's understanding of the control environment gained during its prior-year audits. Additionally, OIG made control-related inquiries to USAGM officials. OIG also obtained and reviewed USAGM's policies and procedures for making payments, performing risk assessments, and reporting payment integrity information.

Prior Office of Inspector General Reports

In May 2024, OIG reported⁴ that USAGM complied with all applicable payment integrity requirements for FY 2023. Specifically, USAGM reported required improper payments information in its FY 2023 Agency Financial Report, published the report on its public website, and conducted program-specific risk assessments. USAGM was not required to perform additional procedures or make other Agency Financial Report disclosures because it did not identify any programs at significant risk for improper payments. OIG did not identify additional efforts needed to prevent and reduce improper payments.

⁴ OIG, *Audit of U.S. Agency for Global Media FY 2023 Compliance With Payment Integrity Requirements* (AUD-FM-IB-24-18, May 2024).

APPENDIX B: U.S. AGENCY FOR GLOBAL MEDIA RESPONSE



**U.S. AGENCY FOR
GLOBAL MEDIA**

330 Independence Avenue SW | Washington, DC 20237 | usagm.gov

April 21, 2025

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TO: OIG – Norman P. Brown, Acting Assistant Inspector General for Audits
FROM: USAGM – Victor Morales, Acting Chief Executive Officer *VM*
SUBJECT: Response to Draft OIG Report – *Audit of U.S. Agency for Global Media FY 2024 Compliance With Payment Integrity Requirements*

Thank you for the opportunity to respond to the Office of Inspector General's (OIG) draft report titled, *Audit of U.S. Agency for Global Media FY 2024 Compliance With Payment Integrity Requirements*.

The U.S. Agency for Global Media (USAGM) appreciates the thoroughness of the report and the highly professional work of OIG staff during this audit. USAGM was pleased to see that the OIG found that USAGM complied with applicable payment integrity requirements during fiscal year 2024 and that no recommendations are necessary as a result of this audit.

I look forward to a continued positive and productive relationship with OIG.



ABBREVIATIONS

OIG	Office of Inspector General
OMB	Office of Management and Budget
PIIA	Payment Integrity Information Act of 2019
USAGM	U.S. Agency for Global Media

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