



Federal Election Commission
Office of the Inspector General

MEMORANDUM

TO: The Commission

FROM: Shellie Purnell-Brown
OIG Senior Auditor *Shellie Purnell-Brown*

SUBJECT: Transmittal of the Audit Report of the Federal Election Commission's
Equal Employment Opportunity and Diversity, Equity, Inclusion,
Accessibility Programs for Fiscal Year 2023

DATE: July 1, 2024

This memorandum transmits the Independent Public Accountants (IPA) Audit Report of the FEC's Equal Employment Opportunity (EEO) and Diversity, Equity, Inclusion, Accessibility (DEIA) Programs dated June 28, 2024. The audit was performed by Brown & Company under a blanket purchase agreement with, and monitored by, the OIG in accordance with generally accepted government auditing standards.

Based on audit work performed, Brown & Company concluded that the FEC has complied with applicable statutory requirements, EEOC laws and regulations and OPM guidance, as well as applicable agency policies and procedures. While no significant deficiencies were identified, we do believe there is an opportunity to improve the representation of underserved communities (specifically Latinos, Native Americans, and minority men) which is covered in a separate management letter of comment. The FEC OIG would also like to recognize the initiatives implemented by the DEIA Council which are helping to improve the diversity and inclusion of the FEC's workforce and environment.

The OIG reviewed Brown & Company's report and related documentation and provided the appropriate oversight throughout the course of the audit. Our review ensures the accuracy of the audit conclusions but may not express an opinion of the results. The OIG's review determined that Brown & Company complied with applicable required Government Auditing Standards.

We appreciate the collaboration and support from FEC staff and the professionalism that Brown & Company exercised throughout the course of the audit. If you have any questions concerning the enclosed report, please contact Ms. Shellie Purnell-Brown at (202) 694-1019.

cc: The Commission

Alec Palmer, Staff Director/Chief Information Officer

Dayna Brown, Deputy Staff Director for Management and Administration

Kevin Salley, Director of EEOO

Lauren Lien, Director of OHR

Lisa Stevenson, Acting General Counsel



**Performance Audit of the Federal Election Commission's (FEC)
Equal Employment Opportunity Office and Diversity, Equity,
Inclusion, & Accessibility Programs**

for Fiscal Year 2023

Performance Audit Report



June 28, 2024

**Prepared by:
Brown & Company Certified Public Accountants and
Management Consultants, PLLC
6401 Golden Triangle Drive, Suite 310
Greenbelt, Maryland 20770**

**Performance Audit of the Federal Election Commission’s
Equal Employment Opportunity Office and Diversity, Equity, Inclusion, &
Accessibility Programs for Fiscal Year 2023**

Performance Audit Report

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BROWN & COMPANY

CERTIFIED PUBLIC ACCOUNTANTS AND MANAGEMENT CONSULTANTS, PLLC

June 28, 2024

Shellie Purnell-Brown, CPA, CFE
Senior Auditor
Federal Election Commission
Office of the Inspector General
1050 First Street, NE
Washington, DC 20463

Dear Ms. Purnell-Brown:

Subject: Performance Audit of the Federal Election Commission's Equal Employment Opportunity Office and Diversity, Equity, Inclusion, & Accessibility Programs for Fiscal Year 2023

Brown & Company CPAs and Management Consultants, PLLC is pleased to submit the attached report detailing the results of our performance audit of the Federal Election Commission's Equal Employment Opportunity Office and Diversity, Equity, Inclusion, & Accessibility Programs for Fiscal Year 2023.

We performed our work from September 28, 2024, through May 7, 2024. We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards, issued by the Comptroller General of the United States. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our conclusion based on our audit objectives. Our objectives, scope, and methodology are described further in the report section titled "Objectives, Scope, and Methodology."

We appreciate the assistance provided by FEC management and staff.



EXECUTIVE SUMMARY

The Office of Inspector General (OIG) for the Federal Election Commission (FEC) engaged Brown & Company CPAs and Management Consultants, PLLC (brown & Company) to conduct a performance audit of the *FEC's Equal Employment Opportunity (EEO) and Diversity, Equity, Inclusion, & Accessibility (DEIA) Programs* as of September 30, 2023, in accordance with the terms and conditions of Contract Number 47QRAA18D000G/9531BP22A0006, Order Number 9531BP23F0031.

Our audit objectives were:

1. To assess FEC's EEO compliance with statutory requirements, applicable U.S. Equal Employment Opportunity Commission (EEOC) and Office of Personnel Management (OPM) guidance, best practices, as well as applicable agency policies and procedures.
2. To analyze FEC's implementation of diversity and inclusion efforts related to the workforce in order to identify strengths and/or barriers including equal opportunity for minorities and women to obtain senior management positions, and increase racial, ethnic, and gender diversity in the workforce.

We conducted this performance audit in accordance with generally accepted government auditing standards. These 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 objectives.

In planning and performing our audit, we identified internal controls components deemed significant to the audit objectives: control environment, risk assessment, control activities, information and communication, and monitoring. We assessed the design, implementation, and operating effectiveness of the relevant internal controls. We did not identify any significant deficiencies in the internal controls necessary to meet the audit objectives. However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Based on audit work performed, we conclude that the FEC complied with applicable statutory requirements, EEOC laws and regulations and OPM guidance, as well as applicable agency policies and procedures. The FEC has implemented adequate EEO and DEIA Programs in accordance with its directives, policies, and procedures. While we did not identify any significant deficiencies that affects the EEO and DEIA Programs that require reporting in accordance with GAGAS, we do believe there is an opportunity to improve the representation of underserved communities (specifically Latinos, Native Americans, and minority men) which is covered in a separate management letter of comment.

Brown & Company hopes that the FEC finds this report constructive and valuable in working towards EEO and DEIA programs that align with its agency's strategic plan and mission.

BACKGROUND

The FEC is an independent regulatory agency responsible for administering, enforcing, defending, and interpreting the Federal Election Campaign Act of 1971. The Commission is also responsible for administering federal public funding programs for presidential campaigns. The mission of the FEC is to protect the integrity of the federal campaign finance process by providing transparency and fairly enforcing and administering federal campaign finance laws.

The EEO Office advises and assists the FEC Commissioners and other principal officers of the FEC in carrying out their responsibilities relative to Title VII of the Civil Rights Act of 1964, as amended and other laws, executive orders and regulatory guidelines affecting affirmative employment and non-discrimination in the federal sector. The EEO Office manages FEC's EEO programs and is instrumental in ensuring the FEC complies with applicable laws, regulations, policies, and guidance that prohibit discrimination in the federal workplace.¹

Violations of Title VII are Prohibited Personnel Practices (PPP), codified at 5 U.S.C. § 2302(b). PPPs are behaviors that are prohibited among the entire federal workforce because they undermine the merit system principles, which demand fairness for all federal employees and applicants for federal employment. The PPP prohibiting discrimination includes every protected class recognized by Title VII, as well as discrimination based on age, disability, marital status, and political affiliation. Federal Agency policies reinforce many of these protections, including the right of every employee to work in a workplace that is free from discrimination, harassment, and retaliation. Additional regulations and EEO guidance include:

- EEOC regulations promulgated at 29 C.F.R. §1614.602 require federal agencies and departments covered by 29 C.F.R. §1614.103(b), to report information concerning pre-complaint counseling, and the status, processing, and disposition of complaints under this part at such times and in such manner as the EEOC prescribes.
- The EEOC's Management Directive (MD) 715 provides federal agencies with a framework for establishing and maintaining effective equal employment opportunity programs. The directive is designed to help agencies identify and eliminate barriers to equal employment opportunities in their workforce.
- EEOC MD 110 provides federal agencies with the procedures for processing complaints of discrimination. This directive outlines the steps and processes that agencies must follow to ensure the effective handling and resolution of EEO complaints. The *EEO Complaints Policy for Applicants, Employees and Former Employees of the Federal Election Commission* sets forth the authority, responsibilities, and procedures under which the FEC manages complaints of employment-based discrimination in accordance with Title VII, Executive Orders and other relevant authorities.
- Executive Order (EO) 13985 (*Advancing Racial Equity and Support for Underserved*

¹ FEC Equal Employment Opportunity website statement, <https://www.fec.gov/about/leadership-and-structure/fec-offices/office-of-the-staff-director/#equal-employment-opportunity> Prohibit discrimination based on age (40 and over), disability, equal pay/compensation, genetic information, harassment, national origin, pregnancy, race/color, religion, retaliation, sex, and sexual harassment.

Communities Through the Federal Government) and EO on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce was signed by President Biden on June 25, 2021. According to EO 13985, “the Federal Government must strengthen its ability to recruit, hire, develop, promote, and retain our Nations’s talent and remove barriers to equal opportunity. It must also provide resources and opportunities to strengthen and advance diversity, equity, inclusion, and accessibility across the Federal Government. Each agency is required to implement an Agency DEIA Strategic Plan.”

In January 2023, the FEC OIG initiated an evaluation of staffing, hiring, and retention at the FEC. This evaluation utilized the OPM Federal Workforce Database as of September 30, 2022, to gather and analyze data about the FEC workforce and benchmarked it against comparable size (medium) agencies located in the Washington, DC, geographic area. Based on the results of the FEC OIG’s evaluation², potential disparities in the FEC’s workforce were identified for certain demographics. As a result, the OIG requested further evaluation of the FEC’s EEO and DEIA Programs, relevant policies, and procedures, including applicable compliance with Title VII of the Civil Rights Act of 1964 (Title VII), EEOC regulations promulgated at 29 C.F.R. §1614.602, and EEOC’s MD 715 and 110.

SUMMARY OF RESULTS

Based on the audit work performed covering the FEC’s activities during fiscal years 2022 and 2023, Brown & Company has determined that the agency is in compliance with its EEO and DEIA Programs. We determined that:

- The FEC complied with the requirements of applicable sections of 29 C.F.R. §1614. and EEOC MD 110 and MD 715.
- The FEC complied with applicable FEC EEO directives, policies, and procedures.
- The data reported on MD 715 was accurate, complete, and reliable.
- The FEC’s efforts to ensure equal employment opportunities are generally effective, though we identified opportunity to improve the hiring of underrepresented groups (e.g. Latinos, Native Americans, minority men).
- The FEC’s DEIA initiatives are contributing to the establishment of a fair and inclusive workplace.

For additional details related to audit work performed, see below.

TESTING OF NEW HIRES AND PROMOTIONS

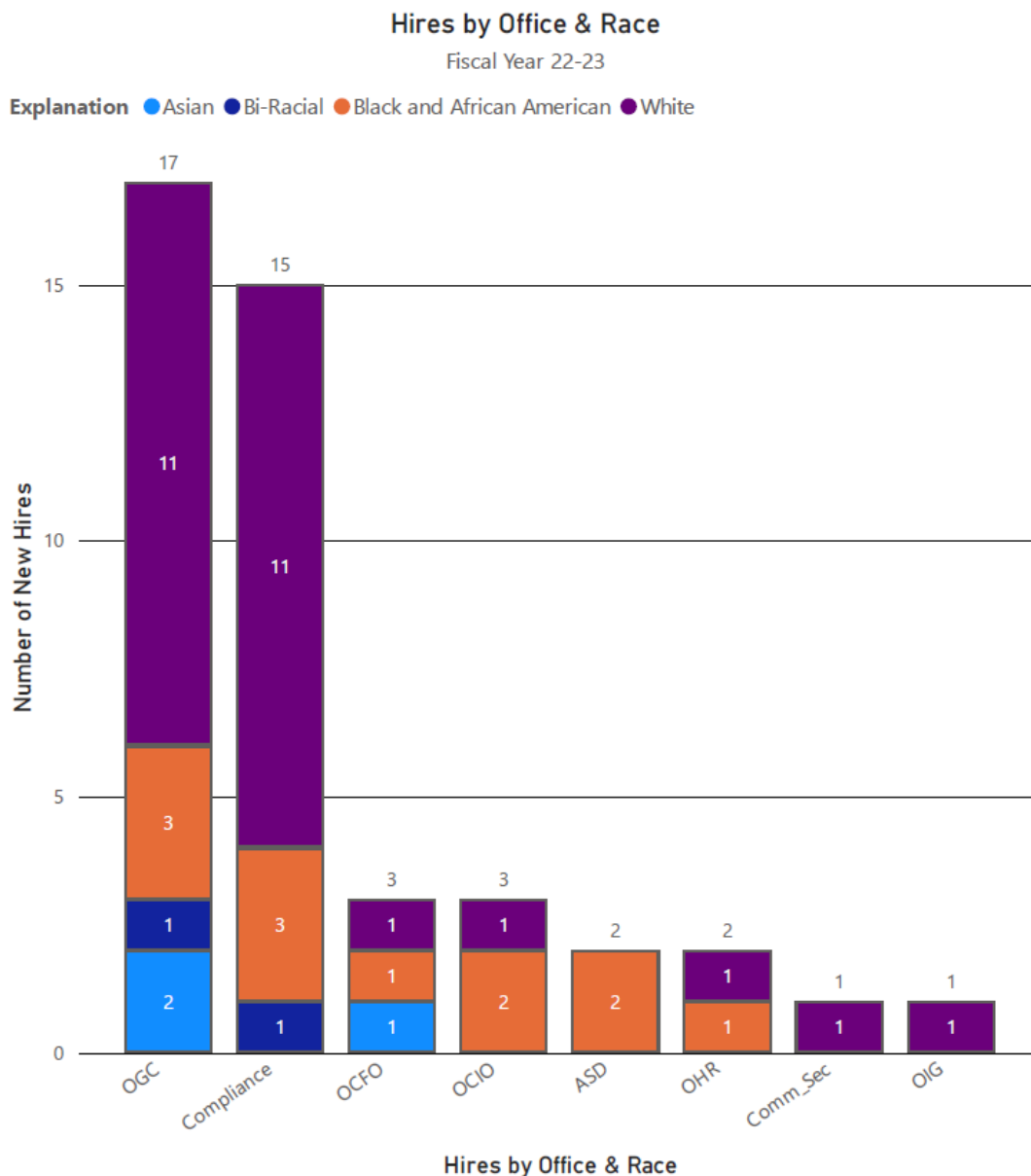
According to the *FEC FY 2022-2026 Strategic Plan, Objective 4, Foster a Culture of High Performance, Strategic Activity 1* states “The FEC’s greatest resource is a well-trained and knowledgeable staff. By increasing our outreach and recruitment efforts and providing a fair, impartial, inclusive and accessible work environment, the FEC can strengthen its diverse workforce of highly performing individuals who offer unique perspectives that will improve the organization’s performance.” Furthermore, the FEC OIG’s FY 23 attrition evaluation identified there are potential barriers and opportunities related to DEIA. Therefore, we determined that FEC’s

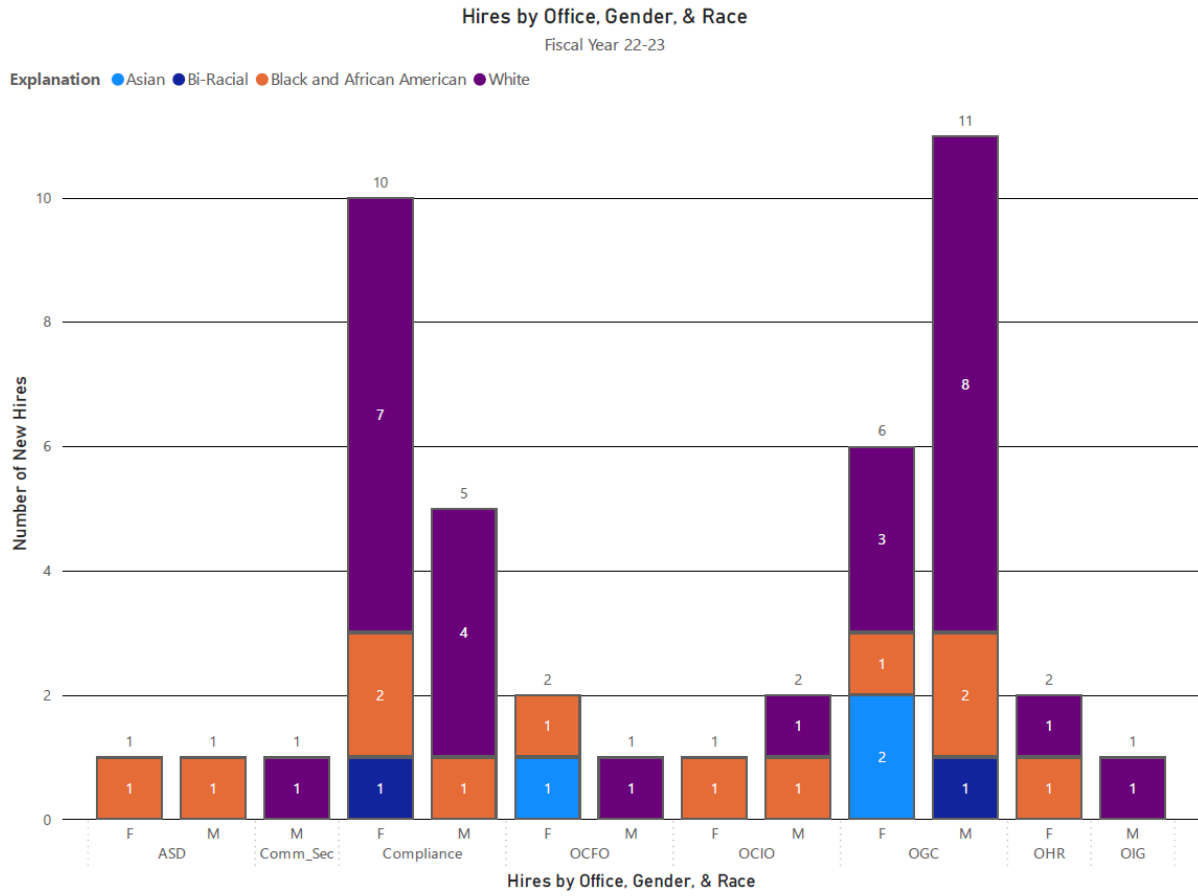
² See OIG Report IE-23-01: *Evaluation of Staffing, Hiring, and Retention at the FEC*

new hire demographics and promotional opportunities for existing employees are vital to related agency's DEIA goals and objectives.

To assess progress made on applicable DEIA goals and objectives, we obtained new hire data and internal promotions data over the last two fiscal periods from October 1, 2021, to September 30, 2023 (the review period). We also reviewed relevant policies, procedures, and performed sample testing of 14 new hires and 11 internal promotions.

For the review period, there were 44 new hires and 43 internal promotions. The charts below breakdown the demographics of new hires and internal promotions:

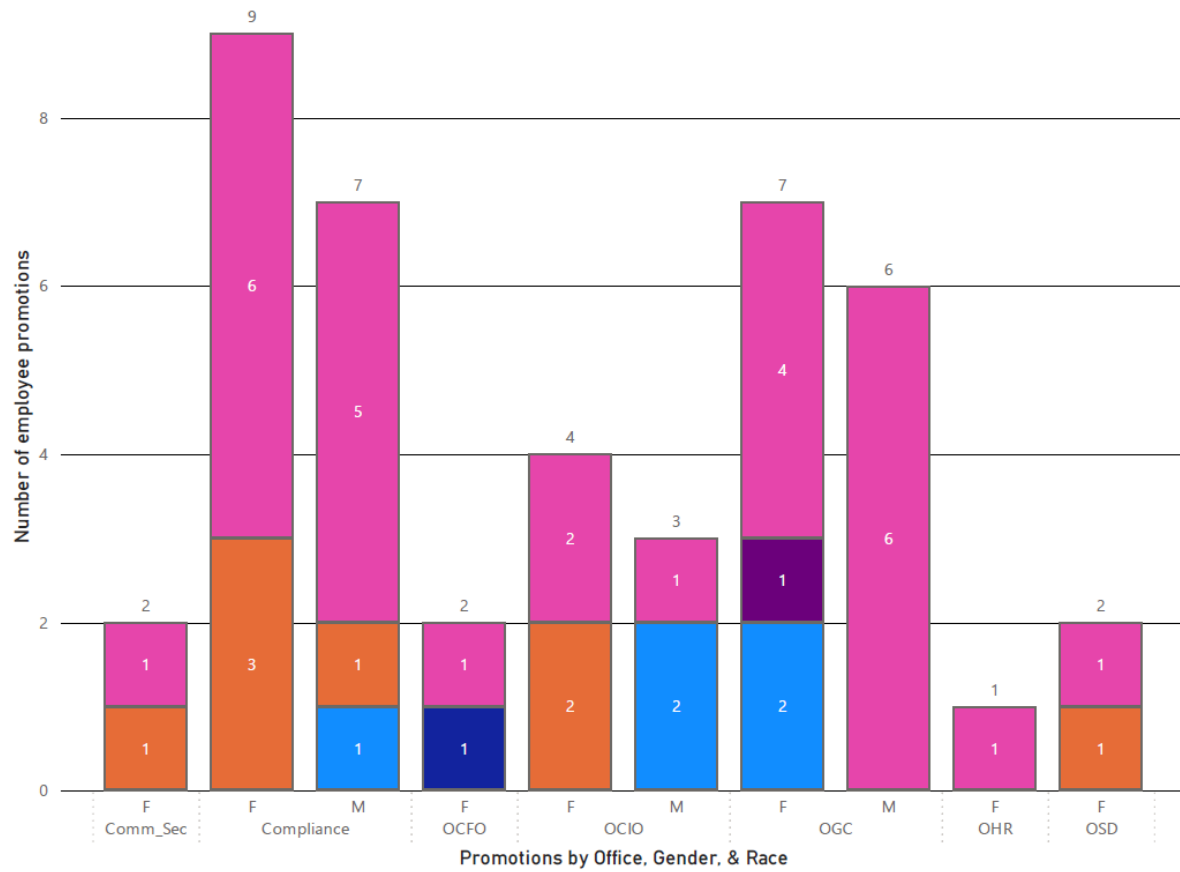




Promotions by Office, Gender & Race

Fiscal Year 22-23

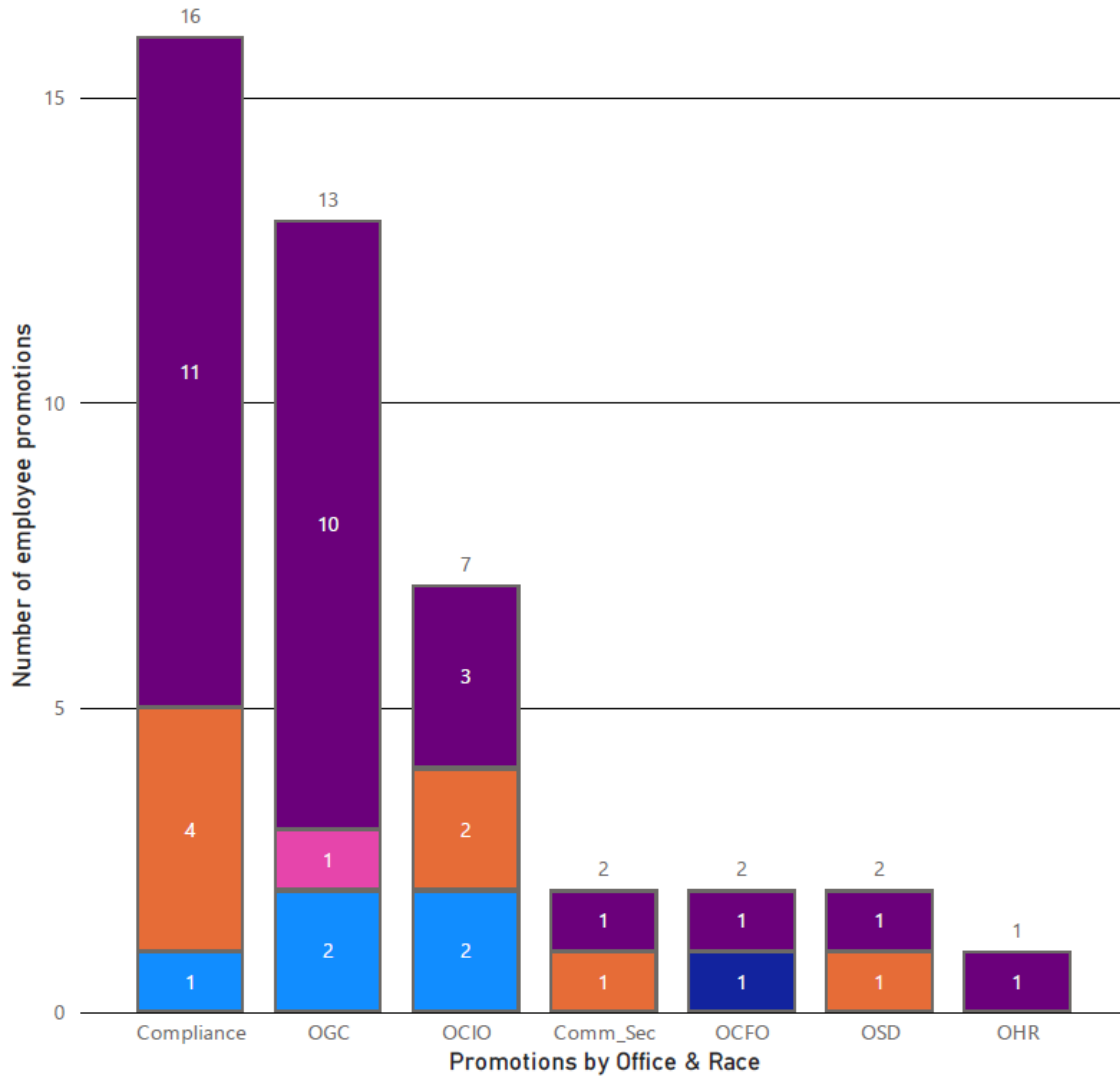
Race ● Asian ● Bi-Racial ● Black and African American ● Hispanic or Latino ● White



Promotions by Office & Race

Fiscal Year 22-23

Explanation ● Asian ● Bi-Racial ● Black and African American ● Hispanic or Latino ● White



Conclusion

Based on the audit work performed, we conclude that the FEC complied with its new hiring policies and procedures and OPM guidance. We acknowledge that Management has made efforts to improve the diversity of its workforce. We also note that Management has implemented the practice of ensuring hiring panels are more diverse. While we did not identify any significant deficiencies or reportable findings, we do believe there is still opportunity to improve the representation of underserved communities (specifically Latinos, Native Americans, and minority men) which is covered in a separate management letter of comment.

OTHER OBSERVATIONS

1. DEIA Initiatives

We noted that the FEC has established a DEIA Council and created the *FEC's Diversity Equity Inclusion and Accessibility (DEIA) Strategic Plan 2021 – 2024*, which includes the following goals:

- Goal 1: Build a More Inclusive Workplace Culture
- Goal 2: Build and Maintain a Diverse, Equitable, and Accessible Workplace
- Goal 3: Build External and Internal Communities of Practice for DEIA

The FEC DEIA Council is Co-Chaired by an EEO staff member and activities are driven by staff volunteers. There have been significant activities to support a more inclusive work environment.

2. DEIA Survey Results

We also conducted an employee survey to help gain insight into the effectiveness of the FEC's implementation of diversity and inclusion efforts related to the workforce. The survey was conducted from February 5, 2024, through February 23, 2024. The survey contained fifty- one (51) questions with three possible responses: (a) Disagree, (b) Agree, but needs some improvement, and (c) Agree. 70 of the 320 (22%) employees responded to the survey. Generally, the FEC employees who responded either agreed or agreed but needs some improvement that the FEC has effectively implemented DEIA activities.

Below is a summary of the survey results broken down into eight focus areas. We calculated the average scores for all questions within each focused area³. See chart below:

Focus Areas	Disagree	Agree, but needs improvement	Agree
1. FEC's overall diversity, equity, and inclusion culture is effective. (70 respondents)	17%	32%	51%
2. FEC effectively promotes equal employment opportunity and diversity in its hiring and recruitment process. (67 respondents)	15%	31%	54%
3. FEC effectively promotes equal employment opportunity and diversity in career and professional development practices. (64 respondents)	34%	26.%	40%
4. FEC effectively promotes equal employment opportunity and diversity in its employee experience. (63 respondents)	13%	38%	49%

³ For each focus areas, the employees responded to various questions. We average the total responses for Disagree, Agree, but needs improvement, and Agree.

Focus Areas	Disagree	Agree, but needs improvement	Agree
5. FEC effectively promotes equal employment opportunity and diversity in its policy and procedure formulation and implementation process. (62 respondents)	13%	20%	67%
6. FEC effectively promotes equal employment opportunity and diversity in its inclusion process. (61 respondents)	13%	24 %	63%
7. Most supervisors at the FEC effectively promote equal employment opportunity and diversity in their supervisory efforts. (61 respondents)	3%	23%	74%
8. FEC's diversity training effectively promotes equal employment opportunity and diversity. (61 respondents)	10%	30 %	60%

Overall, the respondents generally agreed that FEC's DEIA efforts are effective with some room for improvement. The area with the lowest satisfaction is related to equity around professional development and career advancement. This is an area that management should further explore.

3. Compliance with EEO Requirements

We reviewed FEC's FY 22 annual submission of FEC's *Equal Employment Opportunity (EEO) Program Annual Status Report* pursuant to the EEOC MD-715⁴. We also validated the MD 715 FY 2022 data against FedScope Workforce Data⁵. We also reviewed the following reports:

- Certification of Establishment of Continuing EEO Programs
- Federal Agency Self-Assessment Checklist
- Special Program Plan for Persons with Disabilities.

In addition, based on inquiry and review of documents requested, we determined that during the review period, the FEC had no cases that resulted in a judgment, award, or compromised settlement. There were no equal employment opportunity (EEO) administrative complaints filed against the FEC during FY 23. There were no civil actions against the FEC for bases or issues covered under the anti-discrimination statutes or the Whistleblower Protection laws. There was no reimbursement to the Judgment Fund and zero disciplinary actions against any FEC employee for violations of the Anti-discrimination and/or Whistleblower Protection laws.⁶

Based on audit work performed, we did not identify any noncompliance with applicable EEO regulations or guidance. The FY 22 MD 715 was accurate and reported timely.

⁴ FEC 2022 EEOC Management Directive 715 Report, (the Equal Employment Opportunity Program Annual Status Report) June 1, 2023,

⁵ [FedScope - Federal Workforce Data - OPM.gov](https://www.opm.gov/policy-data-oversight/fedscope/)

⁶ As stated in the FEC 2023 Notification and Federal Employee Antidiscrimination and Retaliation Act (No FEAR Act) report.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

The two overall objectives for the FEC EEO and DEIA Programs performance audit were:

1. To assess FEC's EEO compliance with statutory requirements, applicable EEOC and OPM guidance, best practices, as well as applicable agency policies and procedures.
2. To analyze FEC's implementation of diversity and inclusion efforts related to the workforce in order to identify strengths and/or barriers including equal opportunity for minorities and women to obtain senior management positions, and increase racial, ethnic, and gender diversity in the workforce.

Scope

The scope focused on FEC's EEO and DEIA activities during FY 2022 and 2023, as well as current and planned DEIA initiatives applicable to the audit objectives. The scope of this audit was limited to this specific assessment and did not include a comprehensive review of FEC's agencywide EEO and DEIA Programs.

Our audit performance period was from September 28, 2023, through May 7, 2024. We conducted our audit in accordance with GAGAS.

Methodology

We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The following are the components and underlying internal control principles, control objectives, and specific controls deemed relevant to the objectives:

*Components of Internal Control*⁷

1. Control Environment
 - Includes the integrity, ethical values, and competence of the entity's people.
 - Principles:
 1. Demonstrates commitment to integrity and ethical values.
 2. Exercises oversight responsibility.
 3. Establishes structure, responsibility, and authority.
 4. Demonstrates commitment to competence.
 5. Enforces accountability.
2. Risk Assessment
 - Identifies and analyzes risks to achieving the entity's objectives.
 - Forms the basis for determining how risks should be managed.
 - Principles:

⁷ Government Accountability Office (GAO). (2014). Standards for Internal Control in the Federal Government (Green Book).

1. Defines objectives clearly to enable the identification of risks.
 2. Identifies risks to achieving objectives across the entity.
 3. Analyzes and responds to risks.
 4. Assesses fraud risk.
 5. Identifies and analyzes significant changes that could impact the internal control system.
3. Control Activities
- Actions established through policies and procedures to help ensure management directives are carried out.
 - Can be preventive or detective and include approvals, authorizations, verifications, reconciliations, and reviews.
 - Principles:
 1. Selects and develops control activities that contribute to the mitigation of risks.
 2. Deploys control activities through policies and procedures.
4. Information and Communication
- Ensures relevant, quality information is captured and communicated timely to support the internal control system.
 - Enables personnel to perform their responsibilities effectively.
 - Principles:
 1. Uses relevant, quality information to support the internal control system.
 2. Internally communicates information necessary to support the internal control system.
 3. Externally communicates information necessary to support the internal control system.
5. Monitoring
- Assesses the quality of performance over time.
 - Ensures that the findings of audits and other reviews are promptly resolved.
 - Principles:
 1. Conducts ongoing and/or separate evaluations.
 2. Evaluates and communicates internal control deficiencies in a timely manner.

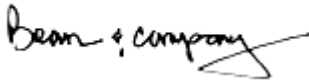
To accomplish our objectives, we completed the following audit procedures:

- Reviewed applicable laws, rules, and regulations pertaining to FEC's EEO and DEIA Program, as well as FEC's policies, procedures, and internal guidelines. For additional context, we reviewed published guidance from EEOC and OPM.
- Obtained an understanding of FEC's internal control over implementation of its EEO and DEIA Programs and evaluated the design and operating effectiveness of relevant controls.
- Conducted interviews with staff from the EEO and Office of Human Resources (OHR) to assess compliance with statutory requirements and implementation of diversity and inclusion efforts related to the workforce.

- Conducted an anonymous survey of 320 FEC staff to garner their views on the effects of the EEO and DEIA Programs. We received responses from sixty-one to seventy of the 320 FEC employees. The survey was conducted from February 8, 2024, to February 29, 2024.
- Reviewed the objectives in the FEC (FY) 2022-2026 Strategic Plan,
- Reviewed and analyzed the FEC's MD 715 reporting details for 2023 and validated the data for accuracy, completeness, and reliability. We agreed the data with the OPM Fed Scope workforce data.
- Reviewed and analyzed the new hiring and promotion population for FY 2022 and FY 2023. We randomly selected fifteen out of forty-four new hires and promotions for testing.
- Evaluated FEC's efforts to implement its EEO and DEIA Programs.
- Leverage prior work from recent FEC OIG engagements⁸ in deciding the level of work needed for the FY 2023 audit.

We used a risk-based approach to prepare for this audit. We assessed the risk of fraud as low. We conducted the audit remotely and relied on audio- and video-conferencing tools in addition to questionnaires completed by the EEO and Office of Human Resources personnel. We also reviewed pertinent records; circulated employee surveys, conducted detail testing, and compiled the results. We reviewed the substance of this report and its findings with EEO and OHR. We used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings and conclusions.

Sincerely,



Brown & Company CPAs and
Management Consultants, PLLC
Greenbelt, MD

June 28, 2024

⁸ *Audit Report of the Federal Election Commission's Human Capital Management Program for Fiscal Year 2022*, dated April 25, 2023, and *Evaluation of Staffing, Hiring, and Retention at the FEC*, OIG Report Number: IE-23-01, November 17, 2023

AUDITOR’S COMMENT TO MANAGEMENT’S RESPONSE

Brown & Company thanks FEC’s management for its comprehensive response to the final draft of our performance audit report. We appreciate the collaborative approach taken by the FEC management. Management’s response underscores the FEC’s commitment to continuous improvement in its EEO and DEIA initiatives. We particularly appreciate the recognition of the audit’s identification of opportunities to enhance the representation of underrepresented groups within the agency.

APPENDIX I – MANAGEMENT’S RESPONSE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

June 27, 2024

MEMORANDUM

To: Shellie Purnell-Brown
Senior Auditor
Office of the Inspector General

Gail Jennifer
Member
Brown & Company CPAs and Management Consultants, PLLC

From: Dayna C. Brown *DCB by ll 6/26/2024*
Deputy Staff Director for Management and Administration
Office of the Staff Director

Kevin R. Salley *KRS*
Director
Office of Equal Employment Opportunity

Lauren Lien *ll*
Director
Office of Human Resources

Subject: Management’s Response to the Final Draft of the “Performance Audit of the Federal Election Commission’s (FEC) Equal Employment Opportunity Office and Diversity, Equity, Inclusion, & Accessibility Programs for Fiscal Year 2023 Performance Audit Report”

Management Response

In September 2023, the Federal Election Commission’s (FEC) Office of the Inspector General (OIG) initiated a performance audit of the FEC’s Equal Employment Opportunity (EEO) and applicable diversity, equity, inclusion, and accessibility (DEIA) programs. This engagement, conducted by Brown & Company CPAs and Management Consultants, PLLC, included a review

of the FEC's Office of Equal Employment Opportunity (OEEEO) and Office of Human Resources (OHR) programs during fiscal years 2022 and 2023. The preliminary objectives of the audit engagement were:

- To assess FEC's EEO compliance with statutory requirements, applicable EEOC and OPM guidance, best practices, and applicable FEC policies and procedures.
- To analyze FEC's implementation of diversity and inclusion efforts related to the workforce to identify strengths and barriers, including equal opportunity for minorities and women to obtain senior management positions and increase racial, ethnic, and gender diversity in the workforce (NOTE: the scope of this audit is limited to this specific assessment and does not include a comprehensive review of FEC's agency-wide diversity, inclusion, and equal employment opportunity programs).¹

The FEC prioritizes administering robust EEO programs through the OEEEO as well as through its OHR staffing programs. The results of this performance audit of the FEC's EEO Office and DEIA validates the emphasis the FEC has placed on the administration of these programs, finding that "the agency is in compliance with its EEO and DEIA Programs" and:

[B]ased on audit work performed, we conclude that the FEC complied with applicable statutory requirements, EEOC laws and regulations and OPM guidance, as well as applicable agency policies and procedures. The FEC has implemented adequate EEO and DEIA Programs in accordance with its directives, policies, and procedures.²

Further, the draft report states that:

- The FEC complied with the requirements of applicable sections of 29 C.F.R. §1614, and EEOC MD 110 and MD 715.
- The FEC complied with applicable FEC EEO directives, policies, and procedures.
- The data reported on MD 715 was accurate, complete, and reliable.
- The FEC's efforts to ensure equal employment opportunities are generally effective, though we identified opportunity to improve the hiring of underrepresented groups (e.g. Latinos, Native Americans, minority men).
- The FEC's DEIA initiatives are contributing to the establishment of a fair and inclusive workplace.³

Management thanks the staff of the Office of the Inspector General as well as the auditors from

¹ Audit Engagement Letter from Gail Jenifer, Brown & Company CPAs and Management Consultants, PLLC, to Shellie Purnell-Brown, FEC Senior Auditor dated January 10, 2024.

² *Performance Audit of the Federal Election Commission's (FEC) Equal Employment Opportunity Office and Diversity, Equity, Inclusion, & Accessibility Programs for Fiscal year 2023 Performance Audit Report*, draft as of 6/12/2024.

³ Ibid.

Brown & Company for their time, consideration, and attention to this important topic at the FEC. Management appreciates the confirmation from the auditors that its EEO policies, procedures, and practices are aligned with applicable rules and regulations and are operating effectively. The audit results were further corroborated by the Partnership for Public Service, which used the FEC's 2023 Federal Employee Viewpoint Survey results to rank the agency 5th out of 30 small agencies on DEIA.⁴ Management also appreciates suggestions received from the auditors regarding opportunities for further improving these programs and will consider recommendations raised in the management letter separately.

⁴ [2023 Best Places to Work in the Federal Government® Rankings • Best Places to Work in the Federal Government](#)

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