March 24, 2016

The Honorable Ron Johnson  
Chairman  
United States Senate  
Committee on Homeland Security and Governmental Affairs  
Hart Senate Office Building, SH-442  
Washington, D.C. 20510

Re: Office of Inspector General Review of NCUA Compliance  
Under the Improper Payments Elimination and Recovery Act (IPERA)

Dear Chairman Johnson:

The Improper Payments Information Act (IPIA) of 2002 and the Office of Management and Budget (OMB) Circular A-123, Appendix C, Management’s Responsibility for Internal Control: Requirements for Effective Measurement and Remediation of Improper Payments, require Federal agencies to review all programs and activities, identify those that are susceptible to significant erroneous payments, and determine an annual estimated amount of erroneous payments made in those payments. The IPIA was followed by the Improper Payments Elimination and Recovery Act (IPERA) in 2010 and a series of OMB memoranda, including an update to Circular A-123, which established new requirements for agencies on improper payments.

The National Credit Union Administration (NCUA) Office of Inspector General (OIG) reviewed NCUA management’s 2015 analysis of its programs and its determination that none are susceptible to a high risk of significant improper payments. The OIG agrees that because NCUA’s improper payments are well below the significant standard amount of improper payments, which is defined by OMB guidance as exceeding $10 million and 2.5 percent of total outlays or $100 million, the OIG does not have anything to review for compliance under IPERA.

Should you have any questions, please do not hesitate to contact my counsel, Sharon Separ, at 703/518-6352.

Sincerely,

James Hagen  
Inspector General