Department of the Treasury Office of the Special Inspector General for TARP (SIGTARP)

Congressional Budget Justification and Annual Performance Plan and Report

FY 2021

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Section I – Budget Request

A – Mission Statement

The Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) is a federal law enforcement agency and an independent audit watchdog that targets financial institution crime, and other fraud, waste, and abuse related to TARP. Protecting Americans, taxpayer dollars, and TARP programs drives SIGTARP's mission.

B – Summary of the Request

The Fiscal Year (FY) 2021 Budget proposes \$17,500,000, a 20 percent reduction from the FY 2020 level. The proposed Budget is intended to fund the Congressionally mandated independent oversight of TARP through SIGTARP criminal investigations and audits. TARP spending continues because TARP foreclosure prevention programs, the Making Home Affordable (MHA) and the Hardest Hit Fund (HHF) programs continue. Banks, mortgage servicers, state agencies, thousands of contractors and other recipients have already received over \$30 billion via these programs. SIGTARP's investigations and audits stop fraud, waste, and abuse of the \$30 billion spent, and recover lost dollars for the Government and other victims. The more than \$3.5 billion in future TARP spending will add to SIGTARP's existing and planned investigations and audits.

Special Inspector General's Comments

Pursuant to section 6(f)(3)(E) of the *Inspector General Act of 1978*, as amended, as applied through the *Emergency Economic Stabilization Act of 2008*, I have concluded that the President's FY 2021 Budget request of \$17.5 million would substantially inhibit the Special Inspector General from performing the duties of the office. I independently proposed an appropriation of \$19 million (an additional \$1.5 million) for FY 2021, as the level needed to support SIGTARP's Congressionally mandated mission to conduct oversight of TARP, while also reflecting an orderly and responsible step down towards TARP's sunset of March 2024. I respectfully request that Congress consider this level, which is a 14 percent reduction from the FY 2020 enacted level; a 17 percent reduction from the FY 2019 enacted level; a 44 percent reduction from the FY 2018 enacted level; and a 54 percent reduction from the FY 2017 enacted level.

The President's Budget request would substantially inhibit our oversight because it will require a larger reduction in staffing and mission support levels than I have determined is necessary to fulfill the mission. The President's Budget request is a 49 percent reduction from the FY 2018 enacted level, even though the same TARP programs are open as in FY 2018 with significant activity, spending more than \$1 billion each year – spending that should be accompanied by SIGTARP's oversight.

In FY 2019 alone, TARP programs had significant operations and spent more than \$1.7 billion. Of this amount, Treasury paid \$1.12 billion in TARP dollars to 74 financial institutions in MHA, including, for example, \$290 million to Ocwen Financial, \$155 million to SPS, \$132 million to Wells Fargo, \$101 million to JP Morgan Chase, \$59 million to Bank of America, \$129 million to Nationstar, \$19 million to Citigroup, and \$5 million to CIT Bank.

As more TARP dollars are spent in MHA and HHF, SIGTARP's investigations and audits over that spending increases. Every TARP dollar spent is another dollar potentially subject to fraud, waste and abuse, increasing the need for investigations and audits. Treasury has already paid more than \$20 billion in MHA. Additionally, through FY 2024, Treasury is obligated or committed to pay \$2.8 billion to banks and non-bank mortgage servicers in MHA to modify these residential mortgages. For example, Treasury is obligated or committed to pay in the future \$675 million to Ocwen Financial, \$359 million to Wells Fargo, \$218 million to JP Morgan Chase, \$152 million to Bank of America, \$338 million to Select Portfolio Servicing, \$340 million to Nationstar, \$69 million to CitiMortgage, and \$22 million to CIT Bank/One West Bank. In the Hardest Hit Fund, 19 state agencies have received more than \$9 billion in TARP funds from Treasury, and have another nearly \$800 million in state agency bank accounts ready to be spent through December 2021.

When left unchecked, fraud, waste, and abuse in these programs can have a devastating impact on those the program are intended to help. HAMP continues today with nearly 800,000 people in all 50 states receiving mortgage modifications to make their payments affordable and sustainable. The billions of TARP dollars that Treasury will pay financial institutions in the future are not automatic, but instead require the banks and other servicers to comply with the law and rules of the program for those homeowners – decisions and actions that require oversight and law enforcement.

There are 40 HHF programs still open to applicants, plus open programs that continue to spend TARP dollars related to existing homeowners, many of which are unemployed or underemployed, and other participants. This year, there were more TARP-funded demolitions of blighted houses than any other year, and 58 percent of all new first-time homebuyers receiving HHF down payment assistance occurred in the last year. Just this past year, more than 29,000 new borrowers came into the program. State agencies told SIGTARP that they expect an additional 8,000 demolitions in the future. After those discussions, Treasury approved an additional 450 demolitions in Ohio. These programs have important goals for communities, goals that would be hurt by fraud, waste, and abuse.

SIGTARP has demonstrated that it is a solid investment for taxpayers, as SIGTARP's work has led to cumulative recoveries for the government and other victims of 11 billion - a 31 time cumulative return on investment (ROI) from our annual budgets.

This ranks SIGTARP as having the third highest ROI out of 18 OIGs reviewed by the Brookings Institution Center for Effective Public Management in its analysis of how cutting the budget of positive-revenue OIGs costs the government money and contributes to the federal deficit.¹

We appreciate Congress's strong support for our budget each year.

¹ Hudak, J. Wallack, G. (2015). *Brookings Institution Center for Effective Public Management*, Website: https://www.brookings.edu/wp-content/uploads/2016/06/CEPMHudakWallackOIG.pdf.

In FY 2019:

- \$900 million was recovered as a result of SIGTARP's law enforcement work, representing a 39 times annual return on investment from our \$23 million budget.
- SIGTARP investigations resulted in criminal charges against 13 defendants, four arrests, criminal convictions of 18 defendants, courts sentencing 28 defendants to prison, federal enforcement activity against three corporations/organizations, and 26 referrals to prosecutors.
- SIGTARP auditors questioned more than \$848,000 in costs, including more than \$411,000 that state agencies in HHF spent on travel and conference costs that violated Federal cost regulations, some of which also constituted waste. For example:
 - The North Carolina agency spent \$130,000 on annual housing counselor conferences including paying \$2,500 to a guest speaker who lectured on "Motivation by Chocolate." Also, before homeowners received a single dollar from HHF, housing counselors were treated to an evening reception featuring a carved beef station staffed by a uniform chef, cake bites and strawberry shortcake martinis.
 - After the Ohio agency decided to close the HHF program to new homeowner applications, it deviated from past practices to hold housing counselor conferences at zoos.
 - Two top Florida officials charged TARP more than a dozen conferences each, often at luxury hotels, beaches and other resort destinations, despite the fact that the state agency was one of the most underperforming state agencies in HHF, providing assistance to only 20percent of applicants, the lowest of any state.
 - Officials from some state agencies attending an annual meeting with Treasury in Washington, D.C. charged TARP for luxury hotels, while other state agencies attending the same meeting stayed at hotels at or near the GSA rate. Two senior Ohio agency officials stayed at the W hotel paying \$315-\$423 per night, while a junior Ohio official on the same trip stayed at a hotel with the rate of \$170 per night.
- SIGTARP has open investigations into financial institutions participating in MHA and receiving TARP dollars. SIGTARP has referred some of these investigations to the Department of Justice, and SIGTARP continues to work these cases with the U.S. Department of Justice (DOJ).
- SIGTARP continued to obtain convictions and sentencings of defendants who defrauded nearly 30,000 homeowners with false promises of entry into HAMP, including some who claimed affiliation with the government, and preyed on the elderly, and other vulnerable Americans. Already, 93 of these scammers were sentenced to prison as a result of SIGTARP's investigations.
- SIGTARP's investigations resulted in the conviction and prison sentencing of the Detroit city official in charge of contracts for HHF's blight demolition program, the conviction for bribery of an official from one of the largest demolition contractors in the HHF program in Detroit, and the indictment of a land bank official in the HHF program in Ohio on one count of conspiracy to commit bribery and honest services fraud, three counts of honest services wire fraud and one count of bribery.
- SIGTARP's investigations resulted in DOJ resolving a false claim act action against the sole contractor in HHF blight demolition in Fort Wayne, Indiana for filling the demolition sites with construction debris rather than clean fill dirt, and falsely billing the HHF program as if it had used clean fill dirt.

- SIGTARP's investigations have also resulted in criminal charges and arrests this year for homeowners defrauding HHF.
- SIGTARP's audits have focused on the costly and harmful risks of asbestos and lead exposure, illegal dumping, and contaminated dirt.
- SIGTARP's recent audit warned Treasury about a lack of fraud controls that led to more than \$437,000 in payments to California homeowners who lost eligibility but continued receiving TARP payments for years.

SIGTARP is grateful for the support of Congress. We will continue to deliver investigative and audit results, and a high return on investment. In every year since FY 2016, recoveries from SIGTARP's work have far exceeded our annual appropriations. Investing in SIGTARP is one of the most effective and efficient ways to protect the Government. The Government will receive far more than our budget in recovered dollars lost to fraud, in addition to cost savings. Our work ensures that TARP dollars are used as Congress intended, and that the government does not pay more for TARP than is necessary.

1.1 – Appropriations Detail Table

Dollars in Thousands								
	FY 2	019	FY 2	020	FY 2	021	FY 2020 to	FY 2021
Appropriated Resources	Operatio	ng Plan	Enac	ted	Req	uest	% Cha	ange
New Appropriated Resources	FIE	AMOUNT	FIE	AMO UNT	FIE	AMO UNT	FIE	AMO UNT
Investigatons	87	\$19,550	75	\$18,920	72	\$15,050	-4.0%	-20.5%
Audit	9	\$3,450	10	\$3,080	8	\$2,450	-20.0%	-20.5%
Subtotal New Appropriated Resources	96	\$23,000	85	\$22,000	80	\$17,500	-5.9%	-20.5%
Other Resources								
Unobligated Balances from Prior Years	0	\$16,912	0	\$14,642	0	\$14,000	NA	-4.4%
Subtotal Other Resources	0	\$16,912	0	\$14,642	0	\$14,000	NA	-4.4%
Total Budgetary Resources	96	\$39,912	85	\$36,642	80	\$31,500	-5.9%	-14.0%

FY 2019 Other Resources and Full-time Equivalents (FTE) reflect actuals.

1.2 – Budget Adjustments Table

Dollars in Thousands		
	FTE	Amount
FY 2020 Enacted	85	\$22,000
Changes to Base:		
Maintaining Current Levels (MCLs):	0	\$510
Pay Annualization (2020 3.1% average pay raise)	0	\$117
Pay Raise (1.0% average pay raise)	0	\$115
FERS Contribution Increase	0	\$141
Non-Pay	0	\$137
Subtotal Changes to Base	0	\$510
FY 2021 Current Services	85	\$22,510
Program Changes:		
Program Decreases	(5)	(\$5,010)
Staff Reduction	(5)	(\$344)
Efficiency Savings	0	(\$946)
Realignment from Annual to No-Year	0	(\$3,720)
FY 2021 President's Budget Request	80	\$17,500

C – Budget Increases and Decreases Description

Maintaining Current Levels (MCLs)+\$510,000 / +0 FTE Pay Annualization (3.1%) +\$117,000 / +0 FTE:

Funds are requested for annualization of the January 2020 3.1% average pay raise.

Pay Raise (1.0% in 2021) +\$115,000 / +0 FTE:

Funds are requested for a 1.0% average pay raise in January 2021.

FERS Contribution Increase +\$141,000 / +0 FTE

Funds are requested for the Federal Employee Retirement System (FERS) contribution rates effective FY 2021.

<u>Non-Pay +\$137,000 / +0 FTE</u>

Funds are requested for non-labor expenses such as travel, contracts, rent, supplies, and equipment.

Efficiency Savings -\$946,000/ -0 FTE SIGTARP will seek to reduce non-personnel costs.

Realignment from Annual to No-Year -\$3,720,000/ -0 FTE

SIGTARP will fund a portion of its operations from its no-year account. SIGTARP actively reduces costs and its footprint, while creating an appropriately sized, skilled and structured workforce.

- In the last two years, SIGTARP cut its footprint by 47 percent in cost and square footage. In FY 2018, SIGTARP eliminated 50 percent of its headquarters annual rent expenses. In FY 2019, SIGTARP eliminated 100 percent of its San Francisco annual rent expense.
- Beginning in FY 2020, SIGTARP is reducing its New York annual rent expense by 43 percent.
- SIGTARP reduced fleet-related expenses by 40 percent since FY 2014.
- In FY 2021, over \$3 million of the proposed budget (23 percent) will be spent on goods and services from the government, more that 95 percent of which will be paid to Treasury.
- SIGTARP has eliminated management layers and is structuring the workforce in such a way to create maximum flexibility as the agency's sunset approaches.
- SIGTARP drives efficiencies through innovative processes and the use of technology, including through data mining.
- SIGTARP coordinates with other law enforcement agencies and Inspectors General, leveraging its unique position and expertise by forming law enforcement and other partnerships to create operational efficiencies and realize cost savings.

1.3 – Object Classification (Schedule O) Obligations

Dollars in Thousands

Object Classification	FY 2019 Actual Obligations	FY 2020 Estimated Obligations	FY 2021 Estimated Obligations
11.1 - Full-time permanent	10,573	9,315	9,128
11.3 - Other than full-time permanent	1,907	1,472	1,384
11.5 - Other personnel compensation	1,034	989	930
11.9 - Personnel Compensation (Total)	13,514	11,776	11,442
12.0 - Personnel benefits	3,915	3,385	3,383
Total Personnel and Compensation Benefits	\$17,429	\$15,161	\$14,825
21.0 - Travel and transportation of persons	261	250	250
23.1 - Rental payments to GSA	138	110	59
23.3 - Communications, utilities, and miscellaneous charges	34	29	20
25.1 - Advisory and assistance services	708	500	200
25.2 - Other services from non-Federal sources	20	20	15
25.3 - Other goods and services from Federal sources	6,692	5,729	1,956
25.6 - Medical care	50	40	30
25.7 - Operation and maintenance of equipment	38	20	15
26.0 - Supplies and materials	138	131	125
31.0 - Equipment	19	10	5
Total Non-Personnel	\$8,098	\$6,839	\$2,675
Total Obligations	\$25,527	\$22,000	\$17,500

Full-time Equivalents (FTE)	96	85	80
Amounts reflect obligations of annually appropriated recourses	does not include unobligated belonges fro	m maion Magne	

Amounts reflect obligations of annually appropriated resources, does not include unobligated balances from prior years (\$17M in FY 2019 and estimated \$14M in FYs 2020 and 2021).

D – Appropriations Language and Explanation of Changes

Appropriations Language	Explanation of Changes
DEPARTMENT OF THE TREASURY	
SPECIAL INSPECTOR GENERAL FOR THE	
TROUBLED ASSET RELIEF PROGRAM	
Federal funds	
SALARIES AND EXPENSES	
For necessary expenses of the Office of the Special	
Inspector General in carrying out the provisions of the	
Emergency Economic Stabilization Act of 2008 (Public	
Law 110–343), [\$22,000,000] \$17,500,000. (Department of	
the Treasury Appropriations Act, 2020.)	

E – Legislative Proposals

PPIP Funds

The *Public-Private Investment Program (PPIP) Improvement and Oversight Act of 2009* (12 U.S.C. § 5231a) provided \$15 million in no-year appropriations to SIGTARP for the purpose of providing oversight to PPIP and the Term Asset-Backed Securities Loan Facility. SIGTARP does not plan PPIP or TALF activity in FY 2020 and FY 2021. SIGTARP is requesting that these PPIP funds be made available to also support SIGTARP's oversight of ongoing TARP programs. This proposed language is identical to that included in the FY 2018 enacted appropriation.

Proposed Language

Section 124

Notwithstanding paragraph (2) of section 402(c) of the Helping Families Save their Homes Act of 2009, in utilizing funds made available by paragraph (1) of section 402(c) of such Act, the Special Inspector General for the Troubled Asset Relief Program shall prioritize the performance of audits or investigations of any program that is funded in whole or in part by funds appropriated under the Emergency Economic Stabilization Act of 2008, to the extent that such priority is consistent with other aspects of the mission of the Special Inspector General.

Section II – Annual Performance Plan and Report

A – Strategic Alignment

The Investigation Division budget supports SIGTARP's priority of law enforcement of crimes and civil violations of the law related to TARP, and the Audit Division budget activity supports SIGTARP as the independent watchdog over TARP dollars and programs.

SIGTARP's activities and goals of justice, impact, innovation, and stewardship support and complement Treasury's FY 2018 – 2022 Strategic Plan goals: (1) boost U.S. economic growth by investigating anti-competitive practices; (2) promote financial stability; (3) enhance national security by investigating money laundering; (4) transform government-wide financial stewardship; and (5) achieve operational excellence.

All of SIGTARP's work aligns with Treasury's strategic goal to promote financial stability given that all TARP programs are designed to promote financial stability. Fraud, waste, and abuse erode that goal. All of SIGTARP's planned work for FY 2021 also aligns with Treasury's Strategic Plan goal (4) "Transform Government-wide Financial Stewardship" by winding down sunsetting programs responsibility and funding the government at the least cost over time. Fraud, waste, and abuse are costly for taxpayers. SIGTARP's efficiency and high return on investment also aligns with Treasury's strategic goal to achieve operational excellence

SIGTARP's audit and investigative goals and priorities are driven by independently-identified TARP threats and findings of fraud, waste, and abuse. SIGTARP's goals through 2023 are:

- Justice protect Americans through law enforcement's fight against TARP-related crime;
- *Impact* assess, understand, and counter the most serious risks, threats, and challenges to TARP;
- *Innovation* expand the use of technology, virtual information sharing, and data analytics to increase the expedited identification of TARP-related crime, fraud, waste and abuse; and
- *Stewardship* ensure TARP programs and oversight proceed responsibly and transparently.

Justice: As a law enforcement office with 85 percent of its resources focused on criminal investigations, SIGTARP strives to bring justice, accountability, and deterrence in the fight against TARP-related crimes, including major financial crimes and money laundering. This past year SIGTARP continued to support prosecutions of defendants SIGTARP investigated. SIGTARP's cumulative law enforcement record includes 430 defendants charged with crimes, and law enforcement actions against 24 corporations/organizations. SIGTARP achieved justice when, in FY 2019, 4 defendants were arrested, 13 defendants were indicted or criminally charged by information, 18 defendants were convicted, and courts sentenced to prison 28 defendants. For example, in FY 2019, courts sentenced four defendants for their part in a wide-ranging investigation into narcotics trafficking and international money laundering that included money laundering at a TARP bank. SIGTARP has one of the highest conviction rates in the federal government, a DOJ conviction rate of 97 percent, achieving operational excellence. *Alignment: Treasury Goals (1), (2), (3), (4), and (5).*

Impact: SIGTARP analyzes risks from the most serious and imminent threats to TARP. SIGTARP prioritizes its resources and conducts confidential investigations to combat serious

threats, the largest of which SIGTARP believes is potential wrongdoing by the more than 130 financial institutions that continue to receive billions of TARP dollars in the MHA program, including some of the nation's largest. Criminal and civil violations of the law by these financial institutions directly lead to foreclosures of homeowners.

SIGTARP's investigations into corruption into the HHF blight demolition program impact competition in, and the integrity of, this federally funded program. In FY 2019, SIGTARP's investigations resulted in the conviction and prison sentencing of the Detroit city official in charge of contracts for HHF's blight demolition program. SIGTARP's investigations also resulted in the conviction for bribery of an official from one of the largest demolition contractors in the HHF program in Detroit. SIGTARP's investigations also resulted in the indictment of a land bank official in the HHF program in Ohio on one count of conspiracy to commit bribery and honest services fraud, three counts of honest services wire fraud and one count of bribery. SIGTARP achieves operational excellence by leveraging task forces and other partnerships to reduce the number of personnel assigned to each case. *Alignment: Treasury Goals (1), (2), (4), and (5).*

Innovation: SIGTARP achieved an unparalleled record of criminal charges against more than 100 bankers through innovation. SIGTARP developed an intelligence-based method to find crime in banks proactively without waiting for a whistleblower. SIGTARP is deploying similar techniques to find crime proactively in the housing, foreclosure, and demolition industries. By expanding the use of technology, virtual information sharing using central repositories of information, and data analytics, SIGTARP can expedite its identification of crime, fraud, waste, and abuse in MHA and HHF. *Alignment: Treasury Goals* (2), (4) and (5).

Stewardship: SIGTARP stands as the independent watchdog for Americans, ensuring that TARP programs operate and spend responsibly. In FY 2019, SIGTARP auditors uncovered that state agencies in the Hardest Hit Fund had spent more than \$411,000 on travel and conference costs that violated federal cost regulations. SIGTARP also uncovered more than \$437,000 in HHF mortgage assistance to California homeowners who had lost eligibility for the program.

SIGTARP also acts as a good steward of taxpayer dollars. SIGTARP reduces its operating budget each year. Additionally, SIGTARP seeks to recover dollars lost to fraud, waste, and abuse for taxpayers and other victims. Every year, recoveries far exceed SIGTARP's budget. FY 2019 recoveries were \$899.2 million, a 39x annual ROI from its \$23 million appropriation. SIGTARP has achieved a 31x lifetime ROI. *Alignment: Treasury Goals (4) and (5)*.

B – Budget and Performance by Budget Activity

2.1.1 – Investigations Resources and Measures

Dollars in Thousands

		FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021
Resource Level		Actual	Actual	Actual	Actual	Actual	Enacted	Request
Appropriated Resources	-	\$27,295	\$32,478	\$32,103	\$28,855	\$19,550	\$18,920	\$15,050
Other Resources		\$6,354	\$376	\$82	\$1,311	\$14,412	\$12,392	\$11,750
Budget Activity Total		\$33,649	\$32,854	\$32,185	\$30,166	\$33,962	\$31,312	\$26,800
Full-time Equivalents (FTE)		115	103	114	106	87	75	72
Performance Measure	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2019 Actual	FY 2019 Target	FY 2020 Target	FY 2021 Target
Percentage of Cases Accepted for Consideration by Civil or Criminal Authorities Resulting in a Positive Final Outcome	N/A	77	81	79	77	70	60	35
Percentage of Cases Presented to Civil or Criminal Authorities within Eight Months of Being Opened	N/A	80	80	85	75	70	50	2:
Precentage of Cases That are Joint Agency/Task Force Investigations	70	71	75	78	76	70	70	70

The FY 2015 - FY 2019 appropriated resources represents the approved operating plan. The FY 2015 - FY 2019 columns represent realized resources for full-time equivalents, reimbursables, and user fees.

Investigations Budget and Performance

(\$15,050,000 from discretionary appropriations, \$11,750,000 from other resources) SIGTARP exceeded all metric targets in FY 2019. The "Percentage of Cases Accepted for Consideration by Civil or Criminal Authorities Resulting in a Positive Final Outcome" in FY 2019 was 77 percent, which exceeded the target of 70 percent. Typically, the positive final outcome is indictment and criminal conviction of individual defendants. Appropriate case selection and effective field performance continue to increase the number of cases resulting in convictions. SIGTARP's rate of conviction for cases prosecuted by DOJ is 97 percent, one of the highest in federal law enforcement. This is a strong indicator of investigative quality. As an investigative agency, SIGTARP must depend on DOJ's ability to accept its cases for prosecution and to move such cases through the courts. SIGTARP will continue to coordinate with the U.S. Attorney Offices and DOJ's Criminal and Civil Divisions on prosecutorial priorities and on the appropriate movement of pipeline investigations to ensure a positive final outcome.

The "Percentage of Cases Presented to Civil or Criminal Authorities within Eight Months of the Case Being Opened" was 75 percent, which exceeded the target of 70 percent. The "Percentage of Cases that are Joint Agency/Task Force Investigations" with other law enforcement agencies was 76 percent, which exceeded the target of 70 percent. Both of these measures recognize that as SIGTARP reduces spending and staffing, it must act with efficiency, in its investigative timeline, and in leveraging other law enforcement partnerships for resources.

2.1.2 – Audit Resources and Measures

Dollars in Thousands								
		FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021
Resource Level		Actual	Actual	Actual	Actual	Actual	Enacted	Request
Appropriated Resources	-	\$6,824	\$7,618	\$7,530	\$5,092	\$3,450	\$3,080	\$2,450
Other Resources		\$1,069	\$99	0	\$231	0	0	(
Budget Activity Total		\$7,893	\$7,717	\$7,530	\$5,323	\$3,450	\$3,080	\$2,450
Full-time Equivalents (FTE)		35	34	27	25	9	10	8
	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2019	FY 2020	FY 2021
Performance Measure	Actual	Actual	Actual	Actual	Actual	Target	Target	Target
Number of Completed Audit								
Products Identifying Waist,								
Abuse, Mismanagement,	N/A	N/A	N/A	6	4	3	2	2
Inefficienceis, or Referrals to								
Investigations Division (units)								

The FY 2015 - FY 2019 appropriated resources represents the approved operating plan. The FY 2015 - FY 2019 columns represent realized resources for full-time equivalents, reimbursables, and user fees.

Audit Budget and Performance

(\$2,450,000 from discretionary appropriations, \$2,250,000 from other resources) SIGTARP exceeded its FY 2019 audit performance target of three for the "Number of Completed Audit Products Identifying Waste, Abuse, Mismanagement, Inefficiencies, or Referrals to Investigations Division," with four products. SIGTARP auditors questioned more than \$860,000 in costs. In one audit, SIGTARP auditors uncovered more than \$411,000 that state agencies in HHF spent on travel and conference costs that violated federal cost regulations, some of which also constituted waste. In another evaluation, SIGTARP made recommendations to mitigate the risk of asbestos and lead exposure in the HHF blight program. In another letter, SIGTARP recommended fraud controls after SIGTARP learned that homeowners received more than \$437,000 in Hardest Hit Fund mortgage assistance after becoming ineligible for the program. SIGTARP auditors also made a referral to SIGTARP's Investigations Division.

D– Evidence-Building Activity

In FY 2019, SIGTARP engaged in the following evidence-building activities:

- Linked spending to program outputs by analyzing SIGTARP's annual return on investment (31 x for FY 2019) by comparing actual dollars recovered annually (\$899 million in FY 2019) compared to appropriations (\$23 million in FY 2019);
- Determined short term and long term questions about how SIGTARP's audits encourage Hardest Hit Fund grant-like recipients to implement practices to support stronger performance, efficiency, and to prevent fraud, waste, and abuse;
- Determined short term and long term questions about the factors that positively lead to prosecutions of SIGTARP investigations;
- Engaged stakeholder state agencies in the Hardest Hit Fund to learn how their demographic and economic forecasts have changed the demand for HHF dollars, and have shifted the dollars from one HHF subprogram to others with higher demand;
- Engaged stakeholder Treasury to determine status of TARP programs and to understand its oversight and management of TARP;
- Engaged stakeholders at DOJ, U.S. Attorney's offices, the Securities Exchange Commission, and state and local prosecutors to discuss their priorities and requirements for prosecution or civil charges;

- Engaged the public through efforts to increase public contacts to SIGTARP's hotline;
- Undertook data analysis related to TARP recipients blight demolition program partners and contractors in the Hardest Hit Fund to inform SIGTARP's efforts in prioritizing SIGTARP resources;
- Undertook data analysis of homeowner data in the HAMP program to inform SIGTARP's investigative efforts; and
- Undertook program evaluation of the Hardest Hit Fund blight demolition program in South Carolina in FY 2019, and began program evaluation of the program in Detroit, Michigan in FY 2019, which will continue in FY 2020.

<u>Section III – Additional Information</u>

A – Summary of Capital Investments

SIGTARP has no capital investments. Capital investments that support SIGTARP are included in the Departmental Offices' plan. A summary of capital investments, including major information technology and non-technology investments, can be accessed at:

https://www.treasury.gov/about/budget-performance/Pages/summary-of-capitalinvestments.aspx.