

U.S. Commodity Futures Trading Commission

January 2024

**Office of Inspector General**

**Strategic Plan**

**Fiscal Year 2024 - 2028**



## A Message from the Acting Inspector General

I am pleased to present the *Strategic Plan 2024-2028* for the Office of the Inspector General (OIG) for the Commodity Futures Trading Commission (CFTC). In my role as Acting Inspector General since May 2023, I have familiarized myself with the functions and organization of the CFTC and, most importantly, its OIG. It is clear that updating and strengthening all OIG work processes will be an important area of focus for the OIG moving forward. In this time of transition, I want to leave this OIG better for the eventual permanent IG. I sincerely believe with additional professional discipline it can transform into a small and mighty CFTC function that is trusted and respected throughout the community. Our plan therefore details our vision, values, goals and, perhaps most important, performance indicators for accountability.



As the nation's derivatives markets regulator, CFTC fosters markets that facilitate efficient risk transfer and accurate price discovery, and protects against imperfect competition, improper trade practices, and fraud. OIG provides effective oversight to help CFTC succeed in its mission. Our vision it to simply empower a small OIG to achieve mighty; igniting a transformation where the smallest actions yield the mightiest impact on lives, businesses, and communities. In this regard, our FY 2024 work plan, issued with this strategic plan, is our down payment for establishing relevant work useful to the CFTC.

A handwritten signature in black ink, reading "Brett M. Baker". The signature is fluid and cursive.

Dr. Brett M. Baker  
Acting Inspector General  
January 2024

## Agency Overview

The mission of the CFTC is: “To promote the integrity, resilience, and vibrancy of the U.S. derivatives markets through sound regulation.” The CFTC and its predecessor were established to protect market participants and the public from fraud, manipulation, and other abusive practices in the commodity futures and options markets. After the 2008 financial crisis and the subsequent enactment of the Dodd-Frank Act, the CFTC’s mission expanded to include oversight of the swaps marketplace.

The Commission consists of five Commissioners appointed by the President, with the advice and consent of the Senate, who serve staggered five-year terms. The President appoints one of the Commissioners to serve as Chairman. No more than three Commissioners may be from the same political party. The CFTC maintains offices in Washington, D.C.; New York, NY; Chicago, IL; and Kansas City, MO.

## OIG Overview

The Commodity Exchange Act (CEA) is a federal statute that regulates the trading of commodity futures and options in the United States.<sup>1</sup> It grants the Commodity Futures Trading Commission (CFTC) the authority to oversee commodity futures and options markets. On the other hand, an Inspector General (IG) is an independent office within a federal agency responsible for conducting audits, investigations, and inspections to promote efficiency and effectiveness within the agency. The [CFTC OIG](#) was created in 1989 in accordance with the 1988 amendments to the Inspector General Act of 1978.<sup>2</sup>

Historically, the OIG operated with a FTE complement of three with the support of contractors to perform financial audits of CFTC. Beginning in 2013, the OIG expanded to nine FTE, and currently hosts six FTEs (authorized at 11 FTEs). Work [products](#) published include financial and performance audits, inspections and evaluations, law and economic reviews, and administrative investigations.

---

<sup>1</sup> 5 USC Chapter 4.

<sup>2</sup> The Inspector General Act Amendments of 1988, P.L. 100-504, 102 Stat. 2515 (1988).

## About This Plan

Our *Strategic Plan for FY 2024 – FY 2028* provides an overview of our organizational goals and objectives for the next four years. As we anticipate the first incoming Inspector General for the CFTC OIG in more than thirty years, we anticipate modernization, transformation, and renewed passion.

## OIG Mission, Vision, and Values

### Mission

Our mission is to promote integrity, efficiency, and effectiveness by promoting for continuous improvement in CFTC's management and program operations. To accomplish our mission, we:

- Conduct independent and objective audits, reviews, inspections, and evaluations of the CFTC programs and operations;
- Conduct independent and objective investigations of potential criminal, civil, and administrative violations that could undermine the ability of the CFTC perform its mission;
- Prevent and detect fraud, waste and abuse in CFTC programs and operations; and
- Keep agency chairperson, commissioners and Congress fully and currently informed of significant issues and developments.

CFTC OIG conducts audit engagements in accordance with the *Generally Accepted Government Auditing Standards* ([GAGAS](#)) issued by the Government Accountability Office (GAO). OIG conducts inspections, evaluations, and other covered products in accordance with the [Quality Standards for Inspection and Evaluation](#) issued by the CIGIE. OIG investigations are performed in accordance with the [Quality Standards for Investigations](#) issued by the CIGIE.

## Vision Statement

**Organizationally Small, Achieving Mighty:** Our vision as a small OIG is to achieve mighty results by:

1. Performing all work to a standard;
2. Producing work that is relevant, accurate, timely, and trusted;
3. Cultivating positive engagement with the agency; and
4. Fostering respect, diversity, growth and excellence within OIG.

## Values Statement

We value integrity, objectivity, independence, innovation, collaboration, inclusion and diversity. We value OIG work that is **accurate, timely, fair, and trusted**. These values are fundamental to the accomplishment of our mission and our daily operations.

## Goals and Performance Indicators

### Goal 1: Perform All Work to a Standard

This goal speaks to the core function of an effective OIG; conducting independent and objective audits, investigations, inspections, and reviews within our jurisdiction. The goal is to promote efficiency, effectiveness, and integrity in the operations of the agency. Inspectors General work to prevent and detect fraud, waste, abuse, and misconduct, ensuring transparency and accountability in government activities.

#### Performance Indicators:

- Policies updated to comply with applicable standards for audits, inspections and evaluations, by April 2024; and
- Investigative policies updated to comply with applicable standards by June 2024.

## **Goal 2: Deliver Relevant, Accurate, Timely and Trusted Work**

### **1. Relevance**

This goal speaks to OIG's work relationship to CFTC. The work performed by the Commodity Futures Trading Commission (CFTC) holds immense relevance in today's global economy. As the regulatory body overseeing the derivatives and futures markets in the United States, the CFTC plays a pivotal role in ensuring the stability and integrity of these markets. By enforcing regulations and monitoring trading activities, the CFTC helps prevent market manipulation, and fraud, and safeguarding the interests of investors and maintaining market confidence. In an era where financial markets are interconnected and complex, the CFTC's efforts are crucial to promoting fair and transparent trading practices, thereby contributing to the overall stability of the financial system and fostering trust among market participants. Its work is instrumental in mitigating risk, fostering innovation, and upholding the integrity of the derivatives and futures markets, making it a cornerstone of financial regulation.

The Office of the Inspector General will address high risk areas. High-risk areas include fraud, cybersecurity threats, enterprise risks, and manipulation. Addressing these high-risk topics are essential for the CFTC to fulfill its regulatory mandate effectively and to ensure fair, transparent, and orderly trading practices, price discovery, and competition in the financial markets under CFTC jurisdiction.

### **Performance Indicators:**

- Discretionary work addresses high risk topics.

### **2. Accuracy**

We will not issue a report that is not factually accurate. All work will be performed to a standard. Accountability will be assured through annual quality reviews. In addition, the audit, inspection & evaluation, and investigation programs will undergo regular peer

reviews as organized through the Counsel of Inspectors General on Integrity and Efficiency (CIGIE).

### **Performance Indicators:**

- Quality control measures are completed prior to draft report issuance;
- All audits, inspections, and evaluations undergo independent referencing prior to issuance;
- Annual Quality Assurance Review (QAR) performed for the audit and inspection and evaluation programs, in addition to peer reviews scheduled every three years; and
- Improvements implemented in existing processes within 90 days of each QAR or peer review.

### **3. Timeliness**

We will strive to meet all mandated deadlines, and in the absence of mandated deadlines we will seek to complete audits, inspections and evaluations, investigations, and all other projects, in time to make a positive impact on ongoing CFTC programs and operations. We will avoid any delay that lessens the impact of our message; however, accuracy will not be sacrificed for the sake of time.

### **Performance Indicators:**

- 70% of reports completed within eight months after the entrance conference. All reports taking longer than eight months will include a statement explaining the reason for the length of time for completion, in the final report.

### **4. Fair and Trusted Reporting**

Fair reporting by Inspectors General refers to the unbiased, accurate, and objective presentation of findings and conclusions in audits, investigations, inspections, and reviews within an organization. Fair reporting means providing clear and comprehensive information about the issues, the methods used to assess them, and the recommendations for improvement. It also means presenting findings independently and without any undue influence, ensuring transparency, and maintaining the integrity of

the investigative process. The result is a final product that is trusted by the agency as relevant, accurate, and timely.

### **Performance Indicators:**

- Ensure team independence and competence for every engagement;
- Propose recommendations that are capable of implementation by the agency under current statutory authority (or in the alternative suggest a legislative opportunity); and
- Offer management sufficient time to comment on every proposed recommendation.

## **Goal 3: Cultivate Working Partnerships with Stakeholders**

This goal speaks to our reputation as a trusted and independent entity that listens to the CFTC, to Congress, and to the voices that rely on the industry CFTC regulates. We know that trusted relationships are necessary to achieve the effective cooperation we rely on from all stakeholders to achieve accurate findings and effective recommendations in our products. We must earn that trust through our knowledge, expertise, work product, and ethics. Our success with this goal, our performance measure, is the extent of cooperation we receive in the conduct of our work. Toward that end, we continuously work with the agency to maintain protocols that inform CFTC employees and contractors of their obligation to cooperate with OIG. Finally, we are accountable; we are required to document in our semiannual reports all instances where information or assistance from the agency is refused. We seek to leverage our relationships and reputation to create work product that assists the agency in the achievement of its mission, and ultimately results in improving internal agency operations.

### **Performance Indicators:**

- Periodic meetings with relevant agency staff and stakeholders during the pendency of each audit, inspection, and evaluation;
- Quarterly awareness stakeholder meetings; and
- Consideration of stakeholder views, input, and topics in the annual OIG Work Plan.



## **Goal 4: Foster Respect, Inclusion, Diversity, and Growth as an OIG Team**

Effective leadership fosters organizational performance through inclusion of diverse employees and viewpoints. For a small Office Inspector General to become mighty, it is important to provide a seat at the table for divergent views, to promote continuous risk-based learning and leadership opportunities, and to create a zero tolerance culture that immediately acts to mitigate behavior that violates applicable laws, regulations, and policy, including the CFTC's Anti-Harassment Policy.

### **Performance Indicators:**

- Support details, training, and other avenues to develop employee competencies and experiences that benefit the OIG; and
- Zero tolerance for confirmed violative behavior.

# Contacting OIG

## Reporting Fraud, Waste, and Abuse

The OIG provides multiple ways to report fraud, waste, abuse and mismanagement. We offer a toll-free Hotline number, a fax number, a hotline email address, an online referral form, and an address for regular mail and walk-ins. We facilitate contractor compliance with 48 CFR § 52.203-13 through these processes.

Visit [Office of the Inspector General | CFTC](#) for more information, or contact us:

OIG Complaint Method	Details
OIG Telephone Hotline	202-418-5510
OIG Fax	202-418-5522
OIG Complaint Email	<a href="mailto:OIGComplaint@cftc.gov">OIGComplaint@cftc.gov</a> (you do not need to identify yourself)
OIG Online Intake Form	<a href="#">OIG Intake Form (cftc.gov)</a>
OIG Address	Commodity Futures Trading Commission Office of the Inspector General Three Lafayette Centre 1155 21st Street, NW Washington, DC 20581

### General Comments and Suggestions

Please send general comments or questions to [OIG@cftc.gov](mailto:OIG@cftc.gov). Comments or questions regarding the CFTC OIG workplan may be emailed to [OIGWorkplan@cftc.gov](mailto:OIGWorkplan@cftc.gov). Comments or questions may also be mailed to CFTC OIG at the address listed above.