U.S. DEPARTMENT OF HOMELAND SECURITY
OFFICE OF INSPECTOR GENERAL

OIG-26-39 September 29, 2026

FINAL REPORT

DHS Complied with the Payment Integrity Information Act and Took Steps to Prevent and Reduce Improper Payments in FY 2025



DHS OIG HIGHLIGHTS

DHS Complied with the Payment Integrity Information Act and Took Steps to Prevent and Reduce Improper Payments in FY2025

September 29, 2026

Why We Did This Audit

PIIA requires agencies to identify and review all programs and activities that may be susceptible to significant improper payments. As part of its PIIA-implementing guidance, OMB requires each agency's Office of Inspector General to review the agency's payment integrity reporting. We conducted this audit to determine whether DHS complied with PIIA in FY 2025.

What We Recommend

We made one recommendation to improve the accuracy of information reported in the Agency's Financial Report.

OIG Access

DHS' Risk Management and Assurance Division responded to our requests for information without delay or denial.

What We Found

The Department of Homeland Security complied with the *Payment Integrity Information Act of 2019* (PIIA) during fiscal year 2025, as required by Office of Management and Budget (OMB) Circular A-123, Appendix C. Based on our review, DHS' overall efforts to prevent and reduce improper and unknown payments appear adequate.

- **DHS met all 10 PIIA requirements for FY 2025.**
- **DHS met OMB's requirement to provide quarterly reporting** on the Federal Emergency Management Agency's Public Assistance – Validate as You Go program, which DHS identified as a high priority in FY 2024.
- **Although DHS did not accurately report the amounts and percentages of overpayments, unknown payments, and proper payments** in the Agency's Financial Report, **the information reported on PaymentAccuracy.gov is accurate.** This discrepancy does not impact DHS' compliance with PIIA.

We determined DHS implemented internal controls that were operating as intended to oversee its components' completion of program identification templates, risk assessments, and improper payment testing.

Note: This audit does not include funds appropriated under Public Law 119-21 as DHS' FY 2025 PIIA testing and reporting are based on FY 2023 disbursements.

DHS Response

DHS concurred with our recommendation. Appendix C contains DHS' management response in its entirety.

Background

The *Payment Integrity Information Act of 2019* (PIIA) requires agencies to identify and review all programs and activities that may be susceptible to significant improper payments, in accordance with Office of Management and Budget (OMB) guidance.[1] An agency must meet all 10 PIIA requirements to comply.[2] OMB also requires each agency's Office of Inspector General (OIG) to review the agency's payment integrity reporting and issue an annual report on its review within 180 days of the publication of the Agency's Financial Report (AFR) and accompanying materials.[3]

According to OMB Circular A-123, Appendix C, *Requirements for Payment Integrity Improvement*, all program payments fall into one of three payment categories:

- A *proper payment* is made to the right recipient for the right amount and in a manner consistent with all program-specific and legally applicable requirements.
- An *improper payment* (IP) is made in an incorrect amount under statutory, contractual, administrative, or other legally applicable requirements. The term IP includes any payment to an ineligible recipient; any payment for an ineligible good or service; any duplicate payment; any payment for a good or service not received, except for payments authorized by law; any payment that is not authorized by law; and any payment that does not account for credit for applicable discounts.
- An *unknown payment* (UP) is one that could be either proper or improper, but the agency is unable to discern whether the payment was proper or improper due to insufficient or lack of documentation. UPs are not IPs. However, they are included in the IP risk assessment in Phase 1[4] of the process of review for IPs and UPs. UPs are reported in Phase 2[5] of that process but separately from the IP estimate.

OMB Circular A-123, Appendix C, mandates that agencies develop an IP risk assessment methodology to determine whether a program is susceptible to significant IPs. The agency must conduct an IP risk assessment (Phase 1) at least once every 3 years for each program with annual outlays greater than $10 million, unless the program is already in Phase 2. If the agency determines that the program is susceptible to significant IPs and UPs, it must conduct payment

[1] OMB issued guidance implementing PIIA in OMB Circular A-123, Appendix C, *Requirements for Payment Integrity Improvement* (March 5, 2021).
[2] *Id.* Appendix D to this report contains a table summarizing DHS' compliance with the 10 PIIA requirements.
[3] OMB Circular A-123, Appendix C, Section VI.C.1.
[4] As defined in OMB Circular A-123, Appendix C, the process of review for IPs and UPs has two phases. In Phase 1, the agency conducts an IP risk assessment at least once every 3 years to determine whether a program is likely to be susceptible to significant IPs and UPs.
[5] According to OMB Circular A-123, Appendix C, during Phase 2 of the process of review for IPs and UPs, a program uses a statistically valid sampling and estimation methodology to report an annual IP and UP estimate. Phase 2 is not required if the results of Phase 1 indicate that the program is not likely to be susceptible to significant IPs and UPs.

integrity testing (Phase 2) and produce a statistically valid and accurate estimate of IPs and UPs given the program's characteristics. If the agency estimates that the combined IPs and UPs will exceed the statutory threshold[6] for any program, it must implement and annually report on a corrective action plan for reducing such payments and preventing them in the future. In addition, the agency must publish any applicable payment integrity information in its AFR and accompanying materials.

The Risk Management and Assurance Division (RM&A) within the Department of Homeland Security's Office of the Chief Financial Officer supports the Department's efforts to identify, reduce, report, and recoup IPs. RM&A coordinates with DHS components and provides guidance to ensure they meet OMB requirements. RM&A's oversight includes the review and approval of all components' IP packages (i.e., disbursements, preliminary and comprehensive risk assessments, and supporting documentation). Additionally, RM&A conducts independent reviews of component payment testing by requesting payment documentation and retesting selected payments.

According to RM&A's *Improper Payments Reduction Guidebook*, Version 1.7, dated March 2024, due to the burden of testing and reporting of programs related solely to disaster supplemental appropriation disbursements, DHS reports its IP and UP estimates for applicable programs 2 years in arrears. Therefore, reporting was based on fiscal year 2023 disbursement activity for all three disaster supplemental programs in Phase 2 and reporting a statistically valid estimate in FY 2025. All other DHS programs in Phase 1 utilized FY 2024 disbursement activity to execute the IP risk assessments.

This audit does not include funds appropriated under Public Law 119-21 as DHS' FY 2025 PIIA testing and reporting are based on FY 2023 disbursements.

In FY 2025, DHS had 176 programs applicable for tracking and reporting to OMB; 96 of those programs exceeded $10 million in annual outlays. DHS completed a comprehensive risk assessment for 63 programs, which accounted for $43.9 billion of DHS' $97.9 billion total disbursement. Of the 176 programs, DHS conducted payment integrity testing for three programs that were deemed susceptible to significant IPs and UPs. These three programs' FY 2023 outlays totaled $21.6 billion, and the programs reported a statistically valid estimate of IPs and UPs in the FY 2025 AFR. Table 1 shows DHS' IP testing results.

[6] OMB Circular A-123, Appendix C, defines the statutory threshold as either $100 million, or both 1.5 percent of program outlays and $10 million of all program payments, made during the fiscal year.

Table 1. DHS FY 2025 Program IP Testing Results

DHS Program Name	Outlays[7] ($M)	IP + UP ($M)	IP + UP (%)	Reduction Target (%)
Federal Emergency Management Agency (FEMA) Funeral Assistance	$301.49	$12.99	4.31%	4.00%
FEMA Public Assistance – Validate as You Go (VAYGo)	$21,313.03	$260.48	1.22%	1.50%
U.S. Immigration and Customs Enforcement (ICE) Procurement, Construction, and Improvements – Disaster Supplemental Funds	$16.00	$.04	.23%[8]	N/A
Total Outlays	$21,630.52	—	—	—

Source: DHS' FY 2025 AFR
N/A – DHS did not report a reduction target for this program in the FY 2025 AFR as it was not considered fully baselined.[9]
— No data

We conducted this audit to determine whether DHS complied with PIIA in FY 2025. We also evaluated DHS' efforts to prevent and reduce IPs and UPs.

[7] Testing for FEMA's Funeral Assistance program; FEMA's Public Assistance – VAYGo program; and ICE's Procurement, Construction, and Improvements – Disaster Supplemental Funds program for the FY 2025 reporting period consisted of payments made in FY 2023.
[8] DHS's testing based upon its Census Measurement Plan resulted in .23% IP/UP rate – based on $37,376 IP/UP and $15,999,217 Disbursement Population ($37,376/$15,999,217 = .23%).
[9] OMB Circular A-123, Appendix C, defines a baseline as a starting point or the benchmark against which future progress can be assessed or comparisons made. If a program has a 24-month reporting cycle where no significant changes occur in the Sampling and Estimation Methodology Plan, the program will most likely be considered to have established a baseline.

Results of Audit

Key Finding 1: DHS Complied with PIIA

DHS complied with PIIA during FY 2025. According to OMB Circular A-123, Appendix C, an agency must meet all 10 PIIA requirements to comply, which DHS did.

However, we identified discrepancies between FEMA's Funeral Assistance program overpayment,[10] UP, and proper payment amounts and percentages reported in DHS' AFR and those reported on PaymentAccuracy.gov. This discrepancy does not impact DHS' compliance with PIIA.

Per OMB Circular A-136, all executive branch agencies that report IPs as a part of the annual data call under OMB Memorandum M-21-19, *Transmittal of Appendix C to OMB Circular A-123, Requirements for Payment Integrity Improvement*, dated March 5, 2021, must provide in their AFR, or performance accountability report, a summary of their payment integrity activities and results with references to supporting data on PaymentAccuracy.gov. The summary should not conflict with data that is available on the payment accuracy website, which is intended to be the complete source for all qualitative and quantitative payment integrity information, including contextual information.

The DHS AFR reported $10.6 million (3.53 percent of total outlays) in overpayments for FY 2025, while PaymentAccuracy.gov reported $9.1 million (3 percent). For UPs, the AFR reported $1.15 million (0.38 percent), while PaymentAccuracy.gov reported $0 (0 percent). For proper payments, the AFR reported both $285.81 million (94.8 percent) and $288.5 million (95.7 percent), while PaymentAccuracy.gov reported $288.5 million (95.7 percent). The amounts and percentages reported on PaymentAccuracy.gov are correct.

According to DHS' RM&A, DHS updated the AFR using an earlier version of the data rather than the final version submitted to OMB. The inconsistent reporting of payment integrity information between DHS' AFR and the official PaymentAccuracy.gov website could result in a lack of transparency and confusion among users of the information.

Recommendation 1: We recommend that the DHS Chief Financial Officer ensure DHS' Risk Management and Assurance Division strengthen internal controls to ensure payment integrity information is reviewed for accuracy and consistency across reporting channels before posting to PaymentAccuracy.gov.

[10] Overpayments and underpayments fall into the IP category.

DHS' Efforts to Prevent and Reduce IPs and UPs Appear Adequate

OMB Circular A-123, Appendix C, requires the OIG to evaluate the agency's efforts to prevent and reduce IPs and UPs. Based on our review, DHS' efforts to prevent and reduce IPs and UPs appear adequate. We determined DHS implemented internal controls that were operating as intended to provide oversight of its components' completion of program identification templates, risk assessments, and IP testing.

DHS reported an IP and UP estimate above the statutory threshold for FEMA's Funeral Assistance program for FY 2025. All other programs reported an IP and UP estimate below the statutory threshold and met DHS' tolerable rate of 1.5 percent or below. Although the Funeral Assistance program has not reached DHS' tolerable IP and UP rate of 2.5[11] percent, we did not make any recommendations because DHS took the following corrective actions to improve payment integrity by requiring FEMA to:

- Acquire the services of a call center service provider to assist with processing the large volume of COVID-19 Funeral Assistance applications;
- Identify process improvements for COVID-19 Funeral Assistance staff, including granting the call center service provider access to Homeland Security Information Network support pages; and
- Expand collaboration with the call center service provider to improve the quality and frequency of quality control reporting. FEMA's Individual Assistance Division, Cadre Management and Training Branch, developed an eLearning training course and provided it to FEMA Applicant Services Section personnel.

DHS Met High-Priority Reporting Requirements

DHS appropriately provided quarterly reporting to OMB on FEMA's Public Assistance – VAYGo program, which DHS identified as a high priority in FY 2024. Based on OMB Circular A-123 Appendix C guidance, FEMA's Public Assistance – VAYGo program is no longer considered high priority, and DHS did not identify any new high-priority programs in FY 2025.

[11] The intended tolerable IP and UP rate for FEMA Funeral Assistance was established based on prior year reporting on PaymentAccuracy.gov.

Appendix A:
Objective, Scope, and Methodology

Our audit objective was to determine whether DHS complied with the PIIA in FY 2025. We also evaluated DHS' efforts to prevent and reduce IPs and UPs.

Three Government shutdowns in FY 2026, spanning 56 percent of the fiscal year through May 1, significantly delayed our audit work.

To achieve our objective, we tested the accuracy and completeness of payment integrity information in DHS' FY 2025 AFR and IP packages, finding it sufficiently reliable to support our audit results.

We assessed DHS' controls over the payment integrity reporting process. However, because our assessment was limited to determining compliance with PIIA, it may not have identified all internal control deficiencies that existed at the time of our audit.

We reviewed PIIA requirements and DHS policies and procedures to understand the payment integrity reporting process. We also interviewed officials from DHS RM&A and evaluated the adequacy of the division's quality assurance review of component-level IP testing.

We also reviewed DHS' FY 2025 AFR and supporting documentation to determine whether DHS met the following 10 PIIA requirements:

1. Published payment integrity information with the AFR;
2. Posted the AFR and accompanying materials on the agency's website;
3. Conducted IP risk assessments for each program with annual outlays greater than $10 million at least once in the last 3 years;
4. Adequately concluded whether the program is likely to make IPs and UPs above or below the statutory threshold;
5. Published IP and UP estimates for programs susceptible to significant IPs and UPs in the accompanying materials to the AFR;
6. Published corrective action plans for each program for which an estimate above the statutory threshold was published in the accompanying materials to the AFR;
7. Published an IP and UP reduction target for each program for which an estimate above the statutory threshold was published in the accompanying materials to the AFR;
8. Demonstrated improvements to payment integrity or reached a tolerable IP and UP rate;
9. Developed a plan to meet the IP and UP reduction target; and

10. Reported an IP and UP estimate of less than 10 percent for each program for which an estimate was published in the accompanying materials to the AFR.

We conducted this audit from January 2026 through July 2026 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401–424, and according to generally accepted government auditing standards. Those 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. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

DHS OIG's Access to DHS Information

During this audit, DHS RM&A provided timely responses to our requests for information and did not delay or deny access to information we requested.

Appendix B:
Recommendations, Management Comments, and OIG Analysis

Management Comments and OIG Analysis:

DHS provided management comments on a draft of this report. Appendix C contains a copy of DHS' response in its entirety. We also received, under separate cover, technical comments from DHS on the draft report, and we made changes to the report as appropriate. DHS concurred with our recommendation, and we consider it open and resolved. A summary of DHS' response to the recommendation and our analysis follow.

Recommendation 1: We recommend that the DHS Chief Financial Officer ensure DHS' Risk Management and Assurance Division strengthen internal controls to ensure payment integrity information is reviewed for accuracy and consistency across reporting channels before posting to PaymentAccuracy.gov.

DHS Response to Recommendation 1: Concur. On May 29, 2026, the OMB published Circular A-136, which is effective for FY 2026 reporting and modifies AFR requirements related to PIIA Reporting, to ensure reported language is consistent and readily available on PaymentAccuracy.gov. Specifically, agencies must provide in their AFR or Performance and Accountability Report:

- The Executive Summary of their payment integrity activities and results provided to OMB in the Data Call;
- A discussion of the agency's use of "Do Not Pay," including an evaluation of whether it reduced improper payments or awards, provided to OMB in the Data Call;
- A report on actions taken during the previous fiscal year to address contractor recommendations regarding overpayments, if applicable; and
- A list of agency reports available on PaymentAccuracy.gov.

Estimated Completion Date: January 29, 2027.

OIG Analysis: DHS' planned corrective action is responsive to the recommendation. This recommendation will remain open and resolved until DHS provides documentation to support the corrective action has been completed.

Appendix C:
DHS Comments on the Draft Report

DHS' formal management response begins on the next page.

U.S. Department of Homeland Security
Washington, DC 20528

Homeland Security

BY ELECTRONIC SUBMISSION

September 25, 2026

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: David Schmitt
Director
Departmental Audit Liaison Office

DAVID E SCHMITT
Digitally signed by DAVID E SCHMITT
Date: 2026.09.25 12:55:34 -04'00'

SUBJECT: Management Response to Draft Report: "DHS Complied with the Payment Integrity Information Act of 2019 and Made Advancements in Its Efforts to Prevent and Reduce Improper Payments in FY 2025"
(Project No. 26-007-AUD-DHS)

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS, or the Department) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

DHS leadership is pleased to note OIG's positive recognition that the Department complied with the "Payment Integrity Information Act of 2019" (PIIA)[1] requirements during the fiscal year (FY) 2025 reporting cycle. Specifically, DHS completed statistical testing and reported extrapolated error rates for three programs on http://www.paymentaccuracy.gov, as well as in the FY 2025 DHS Agency Financial Report (AFR).[2] Each of these programs were risk-assessed to be "susceptible to significant improper payments," during a prior reporting period, and the FY 2025 reported estimates were therefore based on prior year disbursements[3] that were fully assessed in FY 2025, in accordance with Office of Management and Budget (OMB) guidance.

[1] Pub. Law No. 116-117, dated March 2, 2020; https://congress.gov/116/plaws/publ117/PLAW-116publ117.pdf.

[2] "DHS Agency Financial Report for Fiscal Year 2025," published on DHS.gov January 23, 2026; https://www.dhs.gov/sites/default/files/2026-04/26_0123_mgmt_dhs-agency-financial-report-fy2025.pdf.

[3] Testing for the U.S. Immigration and Customs Enforcement (ICE) Procurement, Construction, and Improvements – Disaster Supplemental Funds; Federal Emergency Management Agency (FEMA) Funeral Assistance; and FEMA Public Assistance – VAYGo programs for the FY 2025 reporting period consisted of payments made in FY 2023.

The Department remains committed to promoting financial integrity through the responsible stewardship of taxpayer-provided resources and ensuring proper controls are in place to eliminate fraud, waste, abuse, and mismanagement. As part of this, DHS continues to focus on sustaining compliance with the PIIA legislative requirements and further preventing and reducing improper payments.

The draft report contained one recommendation with which the Department concurs. Attached find our detailed response to the recommendation. DHS previously submitted technical comments under a separate cover for OIG's consideration, as appropriate.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment

Attachment: Management Response to Recommendation Contained in OIG 26-007-AUD-DHS

OIG recommended the DHS Chief Financial Officer (OCFO) ensure DHS's Financial Management and Systems Division (FM&S) Internal Control and Risk Management Oversight (ICRMO) (previously titled the Risk Management and Assurance Division)[4]:

Recommendation 1: Strengthen internal controls to ensure payment integrity information is reviewed for accuracy and consistency across reporting channels before posting to PaymentAccuracy.gov.

Response: Concur. On May 29, 2026, the OMB published Circular A-136[5] which is effective for FY 2026 reporting and modifies AFR requirements related to Payment Integrity Information Act Reporting[6] to ensure reported language is consistent and readily available on PaymentAccruacy.gov. Specifically, agencies must provide in their AFR or Performance and Accountability Report (PAR):

- The Executive Summary of their payment integrity activities and results provided to OMB in the Data Call;[7]
- A discussion of the agency's use of "Do Not Pay," including an evaluation of whether it reduced improper payments or awards, provided to OMB in the Data Call;
- A report on actions taken during the previous fiscal year to address contractor recommendations regarding overpayments,[8] if applicable; and
- A list of agency reports available on PaymentAccuracy.gov.

Further, OMB specified that if the agency provides more payment integrity information in their AFR or PAR than is required by Circular A-136, it may also provide that information via the Data Call for publication on PaymentAccuracy.gov. In alignment with the updated OMB AFR reporting requirements, the OCFO FM&S ICRMO sub-division will replicate language provided in the Data Call for publication in the FY 2026 AFR, thus ensuring complete consistency across reporting channels. Estimated Completion Date: January 29, 2027.

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[4] In April 2026, the DHS OCFO implemented a reorganization. As a result of this reorganization, the prior "Risk Management and Assurance" (RM&A) division has been retitled the ICRMO sub-division and now aligns under the Executive Director of the FM&S Division.

[5] OMB Circular No. A-136, "Financial Reporting Requirements – Revised," dated May 29, 2026; See: https://www.whitehouse.gov/wp-content/uploads/2026/05/OMB-Circular-No.-A-136-2026.pdf.

[6] OMB Circular A-136, Section II.4.5. "Payment Integrity Information Act Reporting."

[7] The Data Call helps to fulfill reporting requirements under the Payment Integrity Information Act of 2019 (Pub. L. No. 116-117) (PIIA) and provides the public with comprehensive improper payment data and information on PaymentAccuracy.gov.

[8] See 31 U.S.C. § 3352(i)(1)(D).

Appendix D:
DHS PIIA Compliance Report Table

Component	1a. Published payment integrity information with the AFR	1b. Posted the AFR and accompanying material on the agency website	2a. Conducted IP risk assessments for each program with annual outlays greater than $10 million in the last 3 years	2b. Adequately concluded whether the program is likely to make IPs and UPs above or below the statutory threshold	3. Published IP and UP estimates for programs susceptible to significant IPs	4. Published corrective action plans for each program as applicable	5a. Published an IP and UP reduction target for each program as applicable	5b. Demonstrated improvements to payment integrity or reached a tolerable IP and UP rate	5c. Developed a plan to meet the IP and UP reduction target	6. Reported an IP and UP estimate of less than 10% for each program
Countering Weapons of Mass Destruction	N/A*	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
U.S. Customs and Border Protection	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Cybersecurity and Infrastructure Security Agency	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Federal Emergency Management Agency (FEMA)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Federal Law Enforcement Training Centers	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
U.S. Immigration and Customs Enforcement (ICE)	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A	Yes
Management Directorate	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Science and Technology Directorate	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Transportation Security Administration	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
U.S. Citizenship and Immigration Services	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A

Component	1a. Published payment integrity information with the AFR	1b. Posted the AFR and accompanying material on the agency website	2a. Conducted IP risk assessments for each program with annual outlays greater than $10 million in the last 3 years	2b. Adequately concluded whether the program is likely to make IPs and UPs above or below the statutory threshold	3. Published IP and UP estimates for programs susceptible to significant IPs	4. Published corrective action plans for each program as applicable	5a. Published an IP and UP reduction target for each program as applicable	5b. Demonstrated improvements to payment integrity or reached a tolerable IP and UP rate	5c. Developed a plan to meet the IP and UP reduction target	6. Reported an IP and UP estimate of less than 10% for each program
United States Secret Service	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A
United States Coast Guard	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A

Source: OIG analysis of the FY 2025 DHS AFR and other information
*N/A – Programs for which certain requirements are not applicable
Note: Information related to DHS OIG programs was not reviewed to avoid potential conflicts of interest.

Appendix E:
Report Distribution

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