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DOGE'S INNOVATIVE APPROACH COULD BE THE ROADMAP FOR INSPECTOR GENERAL REFORM



DOGE's Innovative Approach Could Be the Roadmap for Inspector General Reform

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I. Introduction and Executive Summary

The Department of Government Efficiency (DOGE) has taken the United States by storm. At the time of this writing, DOGE had already saved the United States government \$105 Billion,² just over one month into its existence. DOGE's stated purpose is to eliminate "waste, bloat, and insularity."³ It appears that effort is a resounding success to this point. Indeed, 77% of voters say that an examination of government expenditures is necessary, and 60% of voters think that DOGE is helping make major cuts in government expenditures.⁴

But why did this waste exist in the first place? After all, most agencies have an Inspector General (referred to individually as "IG" and collectively as the "IG community") office that is supposed to, according to the Inspector General Act of 1978, "promote economy, efficiency, and effectiveness" and to "prevent and detect fraud and abuse."⁵ The IG community should already be rooting out the very waste that DOGE is finding.

But this is not so. As Bill Maher recently stated on HBO's "Real Time," "I do know this, because this comes from the Government Accountability Office, that's not Trump's administration, the federal government loses an estimated [\$] 233 to

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² Department of Government Efficiency, *Savings*, accessed March 3, 2025, <https://doge.gov/savings>.

³ The Whitehouse, *Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative*, February 11, 2025, <https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-department-of-government-efficiency-workforce-optimization-initiative/>.

⁴ "February Harvard Caps/Harris Poll: 58% of Voters are More Satisfied with Trump's Job as President Than Biden," Harvard Caps Harris Poll, February 24, 2024, <https://harvardharrispoll.com/press-release-february-2025/>. ("Harvard Caps Harris Poll").

⁵ 5 U.S.C. §424.

521 billion annually to fraud.”⁶ Maher further stated that, after [Trump] fired the IGs, “I thought well, that’s not good, that’s their job watching stuff. But if you’re losing \$521 billion a year, how good are you watchdogging?”⁷

Maheer is correct. It is very apparent there is a problem. But perhaps this is because the IG is set up to fail. The 70+ IG offices are spread across the federal government and are subject to a 63-year patchwork of statutes and authorities. This paper presents a concrete proposal to refocus the IG community so it can better fulfill its statutory mission.

The federal government has grown exponentially in the last several years due in large part to covid-era spending and multiple Biden-era laws costing trillions of dollars,⁸ making the need for effective oversight greater than ever. Suffice it to say, the Federal government is a different beast than it was in 1962 when the first civilian IG was created or even when its organic statute was created in 1978.

It is time to refocus and re-energize the IGs by leveraging the DOGE principles and culture. To do this, operations must be updated, beginning with the IG statutory framework. The legacy IG model is no longer adequate for a federal government spending fourteen times as much as it was when the IG Act of 1978 was passed.⁹ The need for agile and highly technical oversight is too great and has outpaced the statutory framework’s ability to change. Additionally, the IGs must be able to operate independently of agency programs they are supposed to objectively police.

Within this paper, the following objectives will be explored. First, the goal is to sustain and continue the successes of DOGE and incorporate that culture, including the use of Artificial Intelligence (AI), across the federal government. The IG can become an agile, independent, and technologically capable entity, able to rapidly root out waste and transparently return the wasteful funds to the U.S. Treasury.

⁶ Ian Hanchett, “Maheer: We Lose Billions A Year, So the Fired IGs May Not Have Been Doing a Good Job,” Breitbart, February 15, 2025, <https://www.breitbart.com/clips/2025/02/15/maher-we-lose-billions-a-year-so-the-fired-igs-may-not-have-been-doing-a-good-job/>.

⁷ Ibid.

⁸ Travis Fisher, “The Inflation Reduction Act After Two Years: Spending Estimates Reach New Heights, but Green New Deal Supporters Want More,” CATO Institute, August 16, 2024, <https://www.cato.org/blog/inflation-reduction-act-after-two-years-spending-estimates-reach-new-heights-green-new-deal>; “Biden Signs FY 2024 Spending Bill, Higher Education Funding Holds Steady, American Council on Education, March 25, 2024, <https://www.acenet.edu/News-Room/Pages/Biden-Signs-2024-Spending-Bill.aspx>.

⁹ “The American Presidency Project,” UC Santa Barbara, accessed February 26, 2025, <https://www.presidency.ucsb.edu/statistics/data/federal-budget-receipts-and-outlays>.

This IG framework needs clear accountability. In addition to the presidentially appointed and Senate-confirmed Inspector General and Deputy who serve at the pleasure of the President, there must be a sizable team of political appointees supporting the IG's mission. To further ensure accountability, IG personnel at or above GS-15 level (or lower if equivalent in responsibility depending on the agency) must be treated similar to the newly classified Schedule F employees.

Additionally, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) should be overhauled, turning it into a centralized, transparent, and accountable coordinating council advancing the Executive's priorities.

An IG Training Academy should be established at a Federal Law Enforcement Training Center (or equivalent) to ensure the quality and consistency of IG training, particularly in the effective application of technology and aggressive, independent enforcement tactics used so effectively by DOGE. As it stands, the training is too fragmented and scattered.

Considering the patchwork of statutory and Executive Order authorities of that currently apply to the IG community, Congressional action would be beneficial and perhaps necessary to make all of the changes recommended in this paper and to bring consistency within the IG community. Such legislative action would provide, for the first time, a clear and consistent mission to all IGs and bring IG management into concert with the President and presidential priorities to eliminate waste, fraud, and abuse across the government.

Finally, each of these reforms should culminate in a centralized IG. It would be beneficial to have the IG community housed in one location that is independent of their respective agencies. This would enable shared resources, consistency, and would allow for a coordinated effort in overseeing the executive agencies.

II. Background and History

The Inspector General Act of 1978 states the purpose of an IG is to “prevent and detect waste, fraud, and abuse relating to each agency’s programs and operations and to promote economy, efficiency, and effectiveness in the agency’s operations and programs.”¹⁰ The IG is supposed to be nonpartisan, without regard to political affiliation.¹¹

¹⁰ Council of Inspector's General, *Presidential Transition Handbook, The Role of Inspector's General and the Transition to a New Administration*, November 2024, <https://www.ignet.gov/sites/default/files/CIGIE%20Presidential%20Transition%20Handbook%20-%202024.pdf>, 4.

¹¹ Ibid.

As it stands, IGs report to both agency heads and Congress.¹² They are located within their respective agencies, but, paradoxically, are supposed to conduct their audits and investigations independently.¹³

The first non-Department of Defense IG was established by an act of Congress in 1962 (Department of Agriculture).¹⁴ Another was created in the predecessor to the Dept. of Health and Human Services in 1976.¹⁵ The Inspector General Act of 1978 created twelve (12) departmental IGs.¹⁶ The Inspector General Reform Act of 2008 added additional IGs.¹⁷ Some Inspectors General are appointed by the president and Senate confirmed.¹⁸ Some IGs are designated by their respective agency heads.¹⁹ The post-9/11 Homeland Security Act of 2002 amended the 1978 Act to provide IG special agents law enforcement authority to carry firearms, make arrests and execute search warrants.²⁰ Nine additional statutes establish IGs in other agencies.²¹

A total of 74 statutory IGs currently operate across the federal government.²² Statutory IGs can be grouped into four types:

- (1) establishment,
- (2) designated federal entity (DFE),
- (3) other permanent, and
- (4) special.²³

Establishment (33 of 74) and DFE (31) IGs are governed by the Inspector General Act of 1978, as amended, whereas other permanent (7) and special (3) IGs are governed by separate statutes.²⁴ Statutory authority can differ among the four

¹² Ibid.

¹³ Ibid.

¹⁴ Ben Wilhelm, “Statutory Inspectors General in the Federal Government: A Primer,” Congressional Research Service, November 13, 2023, 1, <https://crsreports.congress.gov/product/pdf/r/r45450>.

¹⁵ Ibid.

¹⁶ Department of State, Office of Inspector General, *History*, accessed February 26, 2025, <https://www.stateoig.gov/history#:~:text=The%20Inspector%20General%20Act%20was,and%20appointed%20by%20agency%20heads>.

¹⁷ Wendy Ginsberg and Michael Greene, “Federal Inspectors General: History, Characteristics, and Recent Congressional Actions,” Congressional Research Service, June 2, 2016, 7, <https://sgp.fas.org/crs/misc/R43814.pdf>.

¹⁸ Ibid. 3.

¹⁹ Ibid.

²⁰ Ibid. 2, n. 14.

²¹ Council of the Inspectors General, *Presidential Transition Handbook, The Role of Inspectors General and the Transition to a New Administration*, October 4, 2016, 22, https://www.ignet.gov/sites/default/files/files/Presidential_Transition_Handbook_Web.pdf.

²² Wilhelm Summary.

²³ Ibid.

²⁴ Ibid.

IG types, resulting in varied levels of independence, transparency, and accountability.”²⁵

III. DOGE Provides the Template for Inspector General Reform

It has been widely reported that Elon Musk and several DOGE team members are auditing numerous federal agencies and have already found countless examples of waste, fraud and abuse. It has been able to leverage AI and was able to identify and recruit brilliant young IT personnel to address the complex nature of government systems. DOGE has clearly embraced the President’s agenda and vision, and is dedicated to reducing government excesses.

The problems DOGE has uncovered cannot be refuted. Take, for example, the recent revelation regarding the Treasury’s payment system. The information provided DOGE personnel, according to DOGE’s official X account, detailed the Treasury Access Symbol (TAS) had been optional for approximately \$4.7 trillion in payments and was often left blank, “making traceability almost impossible.”²⁶ Whether this was done with fraud in mind or it was done in innocence, there is no excuse for this happening, much less it going unnoticed by an IG.

Based on DOGE’s findings, it appears numerous agencies were not only poor stewards of taxpayers’ money, they are defying presidential Executive Orders and/or Congressional mandates. For example, as reported February 10, 2025, on X, “The @DOGE team just discovered that FEMA sent \$59M LAST WEEK to luxury hotels in New York City to house illegal migrants.”²⁷ Despite media and Congressional focus on ending such expenditures, there is no indication from the Department of Homeland Security (DHS) Office of the Inspector General (OIG) regarding this matter.²⁸ But, because of DOGE, a number of FEMA personnel were fired and DHS was able to “claw[] back” the entire amount.²⁹

²⁵ Ibid.

²⁶ Department of Government Efficiency (@DOGE), “The Treasury Access Symbol (TAS) is an identification code linking a Treasury payment to a budget line item (standard financial process). In the Federal Government, the TAS field was optional for ~\$4.7 Trillion in payments and was often left blank, making traceability almost impossible. As of Saturday, this is now a required field, increasing insight into where money is actually going. Thanks to @US Treasury for the great work,” X, February 17, 2025, <https://x.com/DOGE/status/1891614960452522187>.

²⁷ Elon Musk (@elonmusk), “The @DOGE team just discovered that FEMA sent \$59M LAST WEEK to luxury hotels in New York City to house illegal migrants. Sending this money violated the law and is in gross insubordination to the President’s executive order. That money is meant for American disaster relief and instead is being spent on high end hotels for illegals! A clawback demand will be made today to recoup those funds,” X, February 10, 2025, <https://x.com/elonmusk/status/1888891512303263815>.

²⁸ It is understandable there is no investigative data available, but it would be helpful if DHS’ OIG gave some indication of its intent to investigate it.

²⁹ Ray Lewis, “Kristi Noem says she ‘clawed back’ FEMA payment to NYC hotels housing migrants,” Fox25, February 12, 2025, <https://okcfox.com/news/nation-world/kristi-noem-says-she-clawed-back->

In another example, Musk detailed Social Security payments to individuals as old as 360.³⁰ Similarly, Musk reported the Social Security system was not designed to “deduplicate” payments and is making payments to several individuals with the same Social Security numbers as well as those with no Social Security number or temporary ID number.³¹ He also described payments to entities on the “no pay list” because the list can take up to a year to update.³² These are exactly the types of payments that should have been flagged by an IG, but were not.

It appears the current Federal IG model is not properly equipped (people and skillsets), motivated (proactive approach), mandated, or capable of functioning at DOGE’s level. This is not necessarily an indictment of IG personnel, but of its operating structure, the size of the federal government, and its increasingly bureaucratic culture that has been captured by diverse agency missions. DOGE has a tentative expiration date of July 2026 and is primarily staffed by short term employees (SGEs). This means to keep this momentum, President Trump and/or Congress will have to make changes, soon, to continue the effort. What started with DOGE should continue with IG reform.

IV. Proposed Reforms

As the IG community has expanded to more than 70 separate offices at agencies and locations around the globe, its ability to execute its core mission has indubitably suffered. While the 14,000 employees working in the IG community theoretically share the same fundamental *raison d’être*, their lack of cohesiveness, uniform practices, and transparency in how they measure their value to the taxpayer all raise deep questions about their functionality. DOGE’s daily revelations have coincidentally placed a spotlight on these shortcomings.

This dynamic creates an opportune time to re-evaluate the structure, systems, and practices of the IG community, from revisiting internal procedures to executive branch-wide management to statutory reforms. This section explores opportunities for reform in each of these categories.

fema-payment-to-nyc-hotels-housing-migrants-homeland-security-federal-emergency-management-agency-dhs-roosevelt-hotel.

³⁰ Elon Musk (@elonmusk), “According to the Social Security database, these are the numbers of people in each age bucket with the death field set to FALSE! Maybe Twilight is real and there are a lot of vampires collecting Social Security,” X, February 16, 2025, <https://perma.cc/6S3L-J6KX>.

³¹ Elon Musk (@elonmusk), “Just learned that the social security database is not de-duplicated, meaning you can have the same SSN many times over, which further enables MASSIVE FRAUD!! Your tax dollars are being stolen.,” X, February 9, 2025, <https://x.com/elonmusk/status/1888484555092312466?lang=en>.

³² Elon Musk (@elonmusk), “To be clear, what the @DOGE team and @USTreasury have jointly agreed makes sense is the following....,” X, February 8, 2025, <https://x.com/elonmusk/status/1888314848477376744>.

a. The IGs Must Return to Their Core Mission of Rooting Out Waste, Fraud, and Abuse

To appreciate the public's concern over the utility and efficacy of the IG community, one need to look no further than the priorities established by its primary organizing and oversight body, CIGIE. First, some important background on the role CIGIE is tasked to play. The Inspector General Reform Act of 2008 created CIGIE.³³ The stated purpose was to “address integrity, economy, and effectiveness issues that transcend individual Government agencies and increase the professionalism and effectiveness of personnel by developing policies, standards, and approaches to aid in the establishment of a well-trained and highly skilled workforce in the offices of the Inspectors General.”³⁴

During the Biden administration, CIGIE clearly took its eye off the ball. The FY 2023 CIGIE report highlights efforts by a “DEIA Committee” that issued a “CIGIE Roadmap for Advancing DEIA” and a “Toolkit for Considering Equity When Conducting Oversight Work” on “how to include equity in oversight work.”³⁵ Their efforts were in “providing general considerations, resources, tools, and examples of how to include *equity* in oversight work.”³⁶ The report goes on to tout CIGIE's efforts documenting year-to-year studies on IG community demographics.

For the IG community, “Human Capital Management” represented the second highest focus (ranked at 51%) as opposed to financial management (39%), procurement management (37%), and grants management (37%).³⁷ Only information technology received a higher focus (74%). DEI was Goal two of four in CIGIE's Five-Year Strategic Plan.³⁸

CIGIE did not outline how diversity, equity, and inclusion and accessibility programs further the IG's purpose and goal of eliminating waste, fraud, and abuse. CIGIE did not outline how such programs were necessary in light of agencies' human resources departments, the EEOC, and other federal programs already focusing on so-called “human management.” The bottom line is that committing more attention to DEI than financial management, procurement management, and grants management appears to provide an unfortunate answer to Bill Maher's comedic yet serious question over the Inspectors General focus. This was not good

³³ 5 U.S.C. §424.

³⁴ Ibid.

³⁵ Council of the Inspectors General, *Annual Report to the President and Congress*, Fiscal Year 2023, 10, https://www.ignet.gov/sites/default/files/files/CIGIEAnnualReporttothePresidentFY2023_FINAL.pdf. (“Fiscal Year 2023 Annual Report”)

³⁶ Ibid.

³⁷ Ibid. 6.

³⁸ Ibid.

“watchdogging.” It is time to return to its core statutory mandate and the DOGE culture and leadership should be the guiding star.

To kickstart this re-alignment, the President could replace CIGIE leadership with DOGE team members and use the organization’s statutory mandate to achieve this overdue cultural and operational reform. Doing so will have the tangential effect of revitalizing discussions over the inefficiencies, bureaucratic hurdles, and statutory complexities that need attention for the IG to live up to its full potential.

b. CIGIE Reform is Critical

Recent media coverage frets over IG firings and replacements. But merely replacing these individuals is a short-term solution at best. Reforming CIGIE is necessary and likely to require structural as well as cultural reform. As documented previously, CIGIE’s injection of ancillary – and harmful – objectives like DEI into the daily activities of its constituent IGs is merely one of the challenges facing the IG community. With waste, fraud and abuse climbing along with the Federal budget, there seem to be no individual IG calls for change, much less a collective CIGIE response demanding it.

Genuine reform will require the direct involvement of the President and, ultimately, Congress. For example, CIGIE has a mandated membership of approximately 80 senior officials, including all IGs, the Controller of the Office of Federal Financial Management, Office of Management and Budget (OMB), a senior FBI official designated by the FBI Director, and numerous other Directors and Deputy Directors.³⁹ Subsequent legislation could reduce this from its current level to a representative number of IGs on a rotating basis, and appropriate representatives of the other agencies or departments based on the issues to be addressed. Not all matters under consideration by CIGIE require a comprehensive list of participants. Similarly, CIGIE’s committees could be re-evaluated for efficacy and appropriate leadership.

The President should consider an IG Advisory Council to suggest appropriate changes to the IG Act, including Section 7 regarding CIGIE. Input would be solicited from across the Executive Branch including IGs, Cabinet members and heads of agencies as direct stakeholders, both General Services Administration (GSA) and Office of Personnel Management (OPM), as well as the Department of Justice (not the IG) given its role in those cases referred for prosecution.

Personnel recommendations must come with a laser-focus on government efficiency, not those with incentives to sustain institutions or expand bureaucratic reach. On this point, one immediate change is clear. CIGIE cannot be the President’s sole, or perhaps even primary, resource for qualified IG candidates.

³⁹ 5 U.S.C. §424.

Those leading the charge to reduce government waste and inefficiency must not view their roles or that of their staffs through the lens of protecting their jobs and bureaucratic power. These positions are best filled with those willing to serve the public for a limited time while making difficult decisions divorced from the incentives of entrenched bureaucratic actors and systems. This has been a critical ingredient behind DOGE culture and should be adopted by the IG community.

c. Investigative Flexibility Should be a Goal

Over the years, various legislative actions have created more and more bureaucratic requirements that have had the effect of reducing operational and investigative capacity of the IG community. Tremendous resources have been dedicated to conducting regular and predictable audits, for example. This creates an endless loop where IGs identify waste and inefficiency – and produce a headline-grabbing report to accompany their findings – but no time is left to correct the problem before the next audit begins.

For instance, the Federal Information Security Management Act (FISMA) *requires* IGs to conduct annual reviews of the agency’s information security program and generate a report to the Office of Management and Budget.⁴⁰ Audits require specific metrics that must be evaluated and there is limited room for interpretation. These audits require dedicated staff time and use up resources available to do discretionary work determined by the IG to be high-risk.

While it is likely that most of these statutorily-required audits serve a valuable purpose, the cumulative effect over the years has been to reduce the potential impact of IGs on actually reducing waste and inefficiency by using their discretion to focus on the highest value investigative target from the taxpayers’ perspective.

d. IGs Should Be More Transparent About the Value They Create

During the ensuing 47 years since its creation, the IG community has identified for recovery, or “better use,” billions of US taxpayer dollars and has successfully pursued cases against those who defrauded the U.S. Government or otherwise violated Federal law. IGs have also uncovered cyber vulnerabilities in their continuing efforts to promote economy, efficiency, and effectiveness in agency programs and operations. IG efforts over the last one-half century are commendable.

For example, in the FY2023 CIGIE results, IGs identified “\$82.2 billion in potential savings from audit recommendations” and an additional “\$10.9 billion

⁴⁰ Federal Reserve, Office of Inspector General, *FISMA*, accessed February 26, 2025, <https://oig.federalreserve.gov/fisma.htm>.

from investigative receivables and recoveries.”⁴¹ Similarly, in 2022, potential savings totaling approximately \$70.1 billion⁴² were identified and 2021 saw \$71.7 billion.⁴³

In the 2023 report, CIGIE pointed out the “...potential savings represent an approximate \$26 return on every dollar invested in OIGs.”⁴⁴ In 2022, it reported a \$20 dollar return.⁴⁵ In 2021, it was \$22.⁴⁶ Inspectors General have been a critical force in watching over the expenditures of taxpayer funds. However, the reported IG results lack a degree of transparency. According to CIGIE reporting, the numbers reported as “potential savings” are actually “Funds to be put to better use [emphasis added]” or “Questioned costs” that were “agreed to by management.”⁴⁷ Absent clarification from CIGIE, *none* of these amounts represent “savings” that were, in fact, returned to the U.S. Treasury. Instead, they represent money the agency could or should “... put to better use.”

What amount of the “savings, receivables and recoveries” were ultimately received by the U.S. Treasury? This information does not appear in the yearly CIGIE reports cited. Does the IG community publish (or know) the amount for each fiscal year? If so, why were they not reported and used for the calculations? Not knowing the answer isn’t acceptable and undermines the public’s ability to fully assess the improved government efficiency made possible by the IG community.

Inspectors General set a trap for themselves by using anticipatory, receivables and recoveries in “Return on Investment” (ROI) statements. If the reporting consisted of actual receivables and recoveries, the “ROI” per dollar would likely fall to a significantly lower number. This may weaken the public’s support for the IG mission at first but would perhaps provide an opportunity for them to explain why deeper reform is needed in other areas – such as increased access to data across agencies and uniform intake processes. Directives to this end are needed in order to make the IG community’s work more transparent and, ultimately, more effective.

⁴¹ Fiscal Year 2023 Annual Report 2.

⁴² Council of the Inspectors General, Annual Report to the President and Congress, Fiscal Year 2022, 1, https://www.ignet.gov/sites/default/files/files/993-043CIGIEAnnualReport2023_jm6.pdf. (“Fiscal Year 2022 Annual Report”)

⁴³ Council of the Inspectors General, *Annual Report to the President and Congress*, Fiscal Year 2021, 1, <https://www.ignet.gov/sites/default/files/files/992-011CIGIEAnnualReport-Full508.pdf>. (“Fiscal Year 2021 Annual Report”).

⁴⁴ Fiscal Year 2023 Annual Report 2.

⁴⁵ Fiscal Year 2022 Annual Report 1.

⁴⁶ Fiscal Year 2021 Annual Report 1.

⁴⁷ Ibid. 18.

e. DOGE Isn't Alone in Meeting Resistance to Data Sharing

As DOGE attempts to audit new federal agencies, it has faced several legal challenges questions its authority to access data and internal systems containing sensitive information. DOGE has clear legal authority⁴⁸ to operate, yet has nonetheless faced substantial pushback from career agency officials and their allies in special interest NGOs and legacy media. Its detractors have even convinced some district court judges to deny it access to some information pending further judicial review.⁴⁹

Yet it may surprise many to learn that restricting access to the critical agency records necessary to find waste, fraud and abuse is not unique to DOGE. This situation is a common occurrence for the IG community and many offices, outside of the most powerful Inspectors General, have been denied access⁵⁰ to critical records needed to perform meaningful oversight. The resistance by agencies and the disparity between IG access levels is a critical issue that likely needs to be addressed by Congress. Absent that, IG offices will have few options beyond documenting their limited access in reports. For instance, in March of 2024, the Department of Energy Office of the Inspector General issued a Special Report directed to the Secretary.⁵¹ The Memorandum stated:

Despite increased Federal efforts to promote information as a valuable national resource and strategic asset, and the progress made by comparable peers, the Department of Energy lacks the data and governance structure necessary to make critical decisions or gain visibility into program objectives. The Department's distributed and decentralized environment further exacerbates already existing data access and management challenges that hinder its ability to provide effective oversight and detect fraud, enhance data-driven management, realize performance improvement, and reduce risk to Federal resources.⁵²

⁴⁸ John O. McGinnis, "Musk's Government Crusade is Legal and All-American," City Journal, February 11, 2025, https://www.city-journal.org/article/elon-musk-doge-legal-democracy?fbclid=IwY2xjawIsTxFlHRuA2FlbQIxMAABHU10JnTTBC13SbLKoxjxKIm_Orh0aF3xCbFBpoQCSdXcPyLH-Q9fNZ0AQg_aem_nzweVVjgE6B6G9KwMcpu-Q.

⁴⁹ *American Federation of Teachers v. Bessent*, Civ. No. DLB-25-0430, *Memorandum Opinion and Temporary Restraining Order* (Feb. 24, 2025), available at https://fingfx.thomsonreuters.com/gfx/legaldocs/dwpkjrzelvm/02242025doge_opm.pdf.

⁵⁰ See, for example, Charles S. Clark, "Obama Administration Frustrates Inspectors General on Records Access," Government Executive, February 3, 2025, <https://www.govexec.com/management/2015/02/obama-administration-frustrates-inspectors-general-records-access/104496/>.

⁵¹ Department of Energy, Office of Inspector General, *Special Report, The Department of Energy's Considerations and use of Data Analytics*, March 2024, <https://www.energy.gov/sites/default/files/2024-03/DOE-OIG-24-14.pdf>.

⁵² *Ibid* 2.

This commentary is hardly useful. But it is not a unique instance. As the country rallies around DOGE and its mission to find greater efficiency in government, particularly in the wake of spurious legal challenges and resistance from entrenched interests inside and outside the government, access to government data is another common goal that should motivate and attract the IG community to hop on the DOGE train. Congress should give clearly stated access to the IG community to meaningfully review the federal agencies' activity.

f. Greater Efficiency Within IG Operations Can Be Found with Better Training

There are numerous opportunities to more efficiently deploy the resources available to the IG community. For instance, the growth of IG staffing to 14,000+ employees has created a need for community-wide training.⁵³ To meet this need, CIGIE formed the CIGIE Training Institute.⁵⁴ However, training is offered in eight different locations.⁵⁵

It would be beneficial for the IG community to have a permanent, dedicated IG Training Academy, similar in application and concept to the Federal Law Enforcement Training Center (FLETC). The federal government studied the fractured nature of Federal law enforcement officer training in the late 1960's and found:

“[T]he quality of training received by Federal law enforcement officers and agents varied greatly from agency to agency. Standardized training was an unexplored concept, and inadequate facilities and duplication of effort were prevalent as each agency independently trained its own personnel. As part of the effort to address these shortcomings and save taxpayer funds, the decision was to utilize the former Glynco Naval Air Station.”⁵⁶

It is true all IG personnel are not law enforcement officers, but the same rationale applies. The current IG training strategy leads to varying quality of training, duplication of efforts, and wasted resources. For example, at present,

⁵³ Council of the Inspectors General on Integrity and Efficiency, *Training Institute*, accessed February 26, 2025, <https://www.ignet.gov/content/training-institute#:~:text=The%20mission%20of%20the%20CIGIE,to%20further%20the%20CIGIE%20mission.>

⁵⁴ *Ibid.*

⁵⁵ Council of the Inspectors General on Integrity and Efficiency, *Select an Academy*, accessed February 26, 2026, <https://cigieprod.servicenowservices.com/x/g/public/classes/params/academy/IGCIA.>

⁵⁶ Federal Law Enforcement Training Centers, *FLETC History*, accessed February 26, 2025, <https://www.fletc.gov/fletc-history.>

CIGIE is preparing a guide for IGs using personnel from existing IG offices.⁵⁷ While useful, there may already be training materials available. If training were consolidated, the IG Academy, regardless of location, could integrate existing materials into an IG training regimen. Training itself could be accelerated.

In the same way that the law enforcement community benefited from consolidating its training into a single, accredited, location, so too would the IG. The IG Academy, in coordination with CIGIE and the IG, would adopt or develop the curriculum necessary to train IG personnel from entry-level courses to advanced-level analytics and challenges. This example is likely not an outlier. If an IG Advisory Council or similar effort were to audit IG practices across the 74 IG offices, it would almost certainly yield many more efficiency-improving suggestions that could be adopted.

g. Co-locating IGs and Moving Toward a Consolidated Federal Inspector General

Each of these reforms, along with the current state of the IG community, leads to the logical conclusion that the IGs should be centralized. As the IG community continued to grow, it acquired more space and deployed to more locations both within the United States⁵⁸ and abroad.⁵⁹ With 14,000 employees spread out over seventy-four agencies, this has led to a large physical footprint with many corresponding inefficiencies.

Structural reform of the sprawling IG community should be studied and pursued. One concept is to relocate IGs to be operate out of the same physical location, away from the agencies they are tasked with investigating. This could increase efficiency and independence as well as reduce opportunity for agency capture. In combination, the objective should be to operate with the fewest, independently located field offices as possible.

This proposed reform appears consistent with President Trump expressed desire to move IGs out of agency or department space in order to bolster their independence. Most IG work should be done in person, and co-locating IGs from across the government will not affect this. Co-locating personnel from varying agencies is already an established practice within the government and GSA is

⁵⁷ Fiscal Year 2023 Annual Report.

⁵⁸ United States Department of Justice, Office of the Inspector General, *Office Directory*, accessed February 26, 2025, <https://oig.justice.gov/about/directory>.

⁵⁹ Office of Inspector General, U.S. Agency for International Development, *Become a Special Agent*, accessed February 26, 2025, <https://oig.usaid.gov/node/508#:~:text=USAID%20OIG%20Foreign%20Service%20employees,Frankfurt%2C%20Germany>.

skilled at allocating “rent” to parent agencies based on agency representation, “common space” and other criteria.⁶⁰

Co-locating federal IGs would yield benefits beyond independence. Co-location and in person work requirements would allow collaboration between IGs and facilitate analytic and/or investigative efforts which involve multiple federal agencies. The parent agencies would benefit from IG relocation and co-location by having the ability to move personnel, such as IT, out of other federal spaces or annexes and into space vacated the IG.

With the recent report that roughly 75% of federal buildings being unused,⁶¹ it is very likely the GSA has a suitable building or buildings in Northern Virginia or within the District of Columbia in existing inventory that would be ideal for co-location of federal IGs.

Co-location provides the opportunity to take overdue action on IG Hotlines. Information provided via IG hotlines, “... is a major source of civil fraud cases for the DOJ and OIG.”⁶² The volume of complaints and their importance warrants a single IG hotline at the co-location facility. According to CIGIE, Federal IGs processed over 740k Hotline complaints in 2023, or one complaint every 10 seconds.⁶³

A single hotline can track and securely provide each complaint to the appropriate IG for action and disposition. A single hotline would provide more than just efficiency, it would allow the IG community to identify duplicate or redundant complaints *before* analytic or investigative resources are expended. It would also give IG personnel overseeing the hotline the ability to identify complaints that point to problems common to multiple IGs as well as problems which will require coordination among multiple IGs. The combined hotline database would be a repository ripe for data mining.

In 2010, the DHS OIG chaired a Working Group to suggest practices to enhance IG hotline operations.⁶⁴ The report addressed staffing, the use of

⁶⁰ United States General Services Administration, *Space Assignment*, accessed February 26, 2025, [https://www.gsa.gov/real-estate/design-and-construction/spatial-data-management/space-assignment#:~:text=The%20Spatial%20Data%20Management%20\(SDM,effect%20on%20an%20agency's%20rent.](https://www.gsa.gov/real-estate/design-and-construction/spatial-data-management/space-assignment#:~:text=The%20Spatial%20Data%20Management%20(SDM,effect%20on%20an%20agency's%20rent.)

⁶¹ Public Buildings Reform Board, *Interim Report to Congress*, March 21, 2024, 7, <https://www.pbrb.gov/files/2024/03/3.21.24-FINAL-PBRB-Interim-Report.pdf>.

⁶² Compliance Resource Center, *The OIG Hotline: Tips for Compliance Officers*, September 2024, <https://www.complianceresource.com/blog/the-oig-hotline-explained-crc/>.

⁶³ Fiscal Year 2023 Annual Report.

⁶⁴ Department of Homeland Security, Office of Inspector General, *Recommended practices for Office of Inspector General Hotline*, October 2010, <https://www.oig.dhs.gov/sites/default/files/assets/Mgmt/ighotline1010.pdf>.

technology, the use of social media, performance metrics, future initiatives and other hotline topics.⁶⁵ The initiatives resulting from the study were forums to allow hotline operators to discuss best practices, develop materials, and get updates on “...relevant developments in law and technology.”⁶⁶ However, a review of publicly available information did not return the results of a follow-up study or the results from any Federal IG that implemented any of the recommendations.⁶⁷ The recommendations for collaboration should have been followed and would have streamlined the hotline process more than a decade ago!

The creation of a consolidated IG office that co-locates IG staff and seeks greater uniformity, efficiency, and consistency in operations will ultimately have to be approved by Congress. However, an interim step could be taken through Executive Order to direct all SES and Schedule F-classified IG staff to co-locate in a building or complex designated by GSA. This could begin the process of knowledge-sharing and re-aligning the incentives driving much of the IG culture and approach to rooting out waste, fraud, and abuse.

h. IG Reform May Have Cascading Benefits that Remove Bureaucratic Capture

By refocusing the IG community on its core mission, reducing inefficiencies, eliminating bureaucratic hurdles, and even co-locating it, IGs may be able to better root out corrupt actors and unaccountable bureaucrats hiding within programs and systems that can have far-reaching consequences for everyday Americans. This may mean a greater ability to coordinate on oversight of massive new programs that span several agencies but lack corresponding oversight funding (e.g., Inflation Reduction Act). In other respects, it may mean releasing the IG community from the type of bureaucratic capture that many Americans believe currently exists due to IG investigations that fail to uncover obvious wrongdoing.

For instance, as detailed in another Council to Modernize Governance paper,⁶⁸ it has been revealed that government agencies and offices have employed resources to fight so-called disinformation, oftentimes in coordination with non-governmental actors. Through investigation by media outlets and Congress, it is clear these efforts resulted in government actors using their authority to censor speech protected by the First Amendment. As court filings and congressional investigations have found, federal agencies’ coordinated suppression of free speech during the COVID pandemic and the 2020 presidential election were all disguised

⁶⁵ Ibid.

⁶⁶ Ibid. 15.

⁶⁷ Perhaps this illustrates why a centralized IG is needed. If one agency makes recommendations that impact many or all other IGs, how can the other 73 be expected to make the reforms needed?

⁶⁸ Curtis M. Schube and Gary Lawkowski, “Restoring Online Free Speech and Shutting Down the Censorship Industrial Complex,” December 2023, <https://modernizegovernance.org/wp-content/uploads/2023/12/Censorship.pdf>.

as unintentional outgrowths of otherwise lawful federal programs. Publicly available information⁶⁹ and reporting raises, at a minimum, serious concerns that civil rights violations were committed by the U.S. Surgeon General, the Center for Disease Control and Prevention, the FBI, and the Cybersecurity and Infrastructure Security Agency within DHS. Sadly, the IG community little to do with investigating or uncovering these findings despite its access to agency communications and statutory mandate to investigate misconduct and abusive government actions.

The reforms envisioned in this paper are all meant to return the IGs to their core mission so that high-profile and, in retrospect, obvious abuses of federal authority will be investigated and revealed much earlier and without the reliance on well-funded outside actors and media outlets. In doing so, the IG community will increase the public's trust in it as an institution dedicated to protecting the taxpayer and public, not a tool of the deep state susceptible to obvious misdirection and bureaucratic double-speak.

V. Conclusion

In a system where a significant portion of the expenditures of a sprawling and expanding federal government are waste, fraud, and abuse, federal IGs are no longer up to the mission they were created to carry out. This is likely a combination of agency capture, distraction with non-core (and controversial) objectives like pursuit of racially-discriminatory DEI goals, and the tsunami of federal spending that took place over the decades, and accelerated during the Biden and COVID eras. The current system of Executive Branch oversight of waste, fraud, abuse and mismanagement needs major reform that extends beyond mere personnel changes. Fortunately, the country's experience with – and support for – the mission and findings of DOGE during the first month of the Trump Administration may show the way forward.

In other words, this is a unique moment for those in the IG community who care so deeply about making the federal government less corrupt, wasteful and unaccountable. To capitalize on this moment, the IG community should publicly embrace DOGE's unapologetic obsession with rooting out waste, fraud and abuse, its willingness to embrace new technology to aid in its mission, and its demands for access to the agency data that can make this mission successful.

As an authorized IG oversight body, CIGIE could play a critical role in this reform. For starters, it could be transformed from its current top-heavy structure to a leaner, more focused entity. Its mission should be to ensure IGs remain laser-focused on identifying and eliminating waste, fraud and abuse – nothing more, nothing less. It should use its bureaucratic force to make IGs more transparent in

⁶⁹ Notably, *Murthy v. Missouri*, 144 S.Ct. 1972 (2024).

their reporting. What is being spent *and* what is being returned to taxpayers based on their efforts must be reported. It can create uniform training and procedures for handling incoming complaints. Many changes similar in nature can be pursued.

Much could be done right off the bat through Executive Order. The President could direct CIGIE to lead the IG reforms by pulling IG leadership across the government into a single location that leverages the best of each offices' expertise, systems, procedures, and staff. This could form the first step of what will likely need to be a congressionally-blessed restructuring of the IG community's operating structure. DOGE leadership should be closely integrated into this effort. This will ensure best practices are employed and previously immovable bureaucratic hurdles are addressed head on with the full authority of the President and popular mandate of DOGE.

This will give Congress time and the imperative to resolve the six-decade patchwork of IG statutes and authorities through passage of a single IG statute. This refinement has the potential to bring the IGs into alignment with presidential priorities and capitalize on the public's thirst for uncovering and eliminating waste, fraud and abuse as DOGE has done so effectively.

At the moment, DOGE has captured the public's attention with its almost daily findings of how the federal government has failed to live up to the electorate's expectations. 72% of voters want a U.S. government agency focused on creating an efficient government.⁷⁰ This is a moment of great opportunity for the institutional watchdogs within the IG community to be empowered to continue cleaning up our federal government. We hope they will meet the moment.

⁷⁰ Harvard Caps Harris Poll.