

Blueprint for Enhanced Program Integrity

Chapter 5: Cross-Cutting Projects

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Executive Summary:

The COVID-19 pandemic required oversight entities to coordinate and work together in new ways to oversee more than \$5 trillion in federal pandemic funding. In this chapter, we share lessons learned and best practices from teams across the Office of Inspector General (OIG) community who collaborated on work related to COVID oversight activities. Staff from more than one OIG with experience conducting audits, evaluations, and inspections participated in projects addressing high-priority issues impacting multiple federal agencies. The projects generally have four main phases: vision, planning, execution, and reporting. The goal of this chapter is to help guide OIGs on future cross-cutting projects.

How We Developed the Chapter

We conducted group interviews with OIGs that had led or participated in six cross-cutting projects. The goal was to identify insights, best practices, and lessons learned in conducting joint oversight work. The interviews focused on vision, planning, timelines, quality assurance, and internal and external communications for each project. We also reviewed internal feedback that OIGs provided during or immediately after the project was completed.

This chapter is designed to provide tips and insights that OIG teams should consider as they conduct cross-cutting projects, keeping flexibility and adaptability in mind. We define “OIG team” as the group of OIGs that participated in a project, and the “lead OIG” as the OIG team that primarily coordinated the logistics for a project.

What is a Cross-cutting Project

Cross-cutting projects bring together staff from various OIGs, with one OIG typically designated as the project lead. The projects provide an opportunity to present a whole-of-government perspective on issues affecting policies and programs across the federal government. See Appendix A for a list of cross-cutting projects.

In general, projects result in three types of products:

1. New Work: Each OIG gathers and analyzes its own agency's data, and a lead OIG consolidates the analyses into a single report. In general, the report is organized around a common theme or program to identify key insights or takeaways across agencies or programs. OIGs can also publish the results of their work in traditional reports/products. For example:

[Pandemic Relief Experiences: A Focus on Six Communities.](#)

[Review of Personnel Shortages in Federal Health Care Programs During the COVID-19 Pandemic.](#)

[Insights on Telehealth Use and Program Integrity Risks Across Selected Health Care Programs During the Pandemic.](#)

2. Derivative or Summary Work: OIG teams summarize work previously published by OIGs to identify key insights or themes across agencies or programs. For example:

[Key Insights: Identity Fraud Reduction and Redress in Pandemic Response Programs.](#)

[Key Insights: State Pandemic Unemployment Insurance Programs.](#)

[Key Insights: COVID-19 in Correctional and Detention Facilities.](#)

3. Guides and Resources: OIG teams identify and review various types of products across the oversight community. These projects provide reference materials that capture lessons learned and best practices when conducting oversight work. For example:

[Agile Oversight in a Time of Crisis: Lessons Learned and Best Practices in Conducting Oversight during the COVID-19 Pandemic.](#)

[Agile Products Toolkit.](#)

Why Cross-Cutting Projects

This type of work comes with complexities, yet it has rewarding possibilities. Projects can be complicated, take longer than anticipated, and usually fall outside of the “normal” oversight plans prepared by OIGs each year. Nevertheless, benefits outweigh challenges.

Cross-cutting projects:

- **Provide holistic oversight** of issues affecting various agencies and their programs.
- **Identify trends or patterns** of fraudulent activities occurring across different programs.
- **Offer an opportunity to learn** from other OIGs about activities that may help improve their own OIG’s internal processes and procedures.
- **Provide new insights** to the OIG community, Congress, and the public.

To hear more about cross-cutting projects, visit these OIG links:

Department of Veteran’s Affairs OIG.

[VA OIG Team Reflects on PRAC Healthcare Subgroup Work](#)

Department of Health and Human Services OIG.

[Telehealth During the COVID-19 Pandemic: Lessons Learned by IGs](#)

Conducting Cross-Cutting Projects

The main phases of a cross-cutting project—vision, planning, execution, and reporting—provide a structured roadmap for navigating complexity, promoting accountability, and driving meaningful outcomes. Together, they help project teams stay aligned, adapt to evolving needs, and increase the likelihood of successful implementation. The following sections explore each phase in detail.

Vision



The key first step in conducting a joint oversight project is establishing the project’s vision, which includes defining the project’s goals, identifying who will be involved, and gaining buy-in from OIG senior leadership.

Defining project goals

- Determine the topics of interest that cut across departments and explore the feasibility of doing the work.
- Use surveys to canvas a group of OIGs on the areas that they are concerned about in their programs; available data related to the program, including access to and quality of the data; and work they have done on the topic.

Identifying participating OIGs

- Consider the diverse knowledge, experience, and skills that each OIG can bring to the project, as well as the number of participating OIGs to best support project goals.
- Work together to designate a lead (or co-leads) responsible for overall stewardship of the project. The lead OIG can help keep the project moving forward and coordinate tasks and timelines.

Surveys:

When working with various OIGs, an initial short survey is helpful to identify common challenges or risk areas. The survey could include questions about:

1. Specific issues that are impacting a program, such as identify fraud.
2. Data needed, specifically data sources and challenges accessing it, data quality, and estimated time to conduct data analysis.
3. Planned, current, and completed work to help inform project planning.

Supporting the vision

- Establish among OIG leadership a shared understanding of—and buy-in to—the project’s vision. Building consensus and having strong leadership support from beginning to end are essential to the project’s success and can help ensure flexibility and accommodate differences throughout the project.

Planning



Planning how to execute the high-level vision and goals and what part each OIG will play is critical to the success of the project. Thorough and thoughtful planning will pay dividends down the road.

Establish roles and responsibilities

- Consider differences in OIG staff’s expertise and availability to match roles and responsibilities with project needs and expectations.
- Define each OIG’s responsibilities, including those of senior leadership and staff, to ensure that all participants understand expectations. This clarity strengthens accountability across the project.

Communicate regularly

- Promote project efficiency and effectiveness with frequent communication within the OIG team.
- Ensure meetings, emails, shared documents, and the project timeline are accessible to all participants.
- Use “office hours” to address ad hoc questions or issues that OIG teams came across during the project.

Office Hours:

A standing day/time when the lead OIG team is available for participating OIGs to drop in and ask questions, discuss challenges, brainstorm potential solutions, and share best practices.

Determine standards, methodology, and quality assurance

- Discuss standards, methodology, and quality assurance early on can prevent delays later.
- Discuss and understand what standard each OIG will follow and the impact on project expectations—CIGIE [Blue Book](#) or [Silver Book](#), or the [Government Accountability Office \(GAO\) Yellow Book](#).

- Identify the methodologies and quality assurance processes that each OIG plans to use when collecting and analyzing data. This can help promote comparable results across OIGs and facilitate summarizing data.
- Establish processes for maintaining records, evidence, and work papers in ways that meet the agreed-upon standards.
- Develop an agreement, such as an attestation form, describing the standards that OIG teams will follow when conducting the project.

What is an Attestation:

An attestation can document the methods that an OIG used to conduct the project and could include a description of the steps it took to verify data quality. Each OIG signs an attestation for the project.

Develop the vision for the final product

- Develop a vision for what the final product will look like allows each OIG to understand what will be required during the execution and reporting phases.
- Identify a “style guide” or standardized template that will be used for the product.

Balance standardization and flexibility

- Standardize reporting, such as presenting information uniformly across OIGs, can be a challenge when doing joint work.
- Balance standardized reporting with flexibility to demonstrate the uniqueness of each OIG.

Consider scope, timelines, and staffing

- Determine the project’s scope and avoid increasing it as the project progresses, which could lead to mission creep and strain on available resources.
- Set realistic timelines, factoring in coordination amongst multiple partner OIGs. Build flexibility into the timeline and understand that setting a schedule that’s too tight can have negative impacts later in the process.
- The number and capacity of staff participating from each OIG will dramatically impact the scope and timeline of the project. Further, many OIGs continue their normal workload in addition to conducting joint work. Teams should take stock of these resource considerations early in the planning process to ensure OIGs have a reasonable share of responsibilities.

Execution



Once the project team has finished planning, it's time to execute the vision. Execution may include collecting and analyzing data or identifying relevant work and scrutinizing for themes, best practices, and lesson learned.

Collect and analyze data

- Templates can help save time when collecting data and can ensure that the data is gathered consistently and accurately.
- Flexibility and regular communication with the lead OIG are essential to address unexpected challenges that may arise.
- During data collection, problems with the data may surface requiring communication with the lead OIG to determine what data is necessary and what adjustments are needed.

What is a Template:

Templates can be extremely helpful when planning and executing the project. In some cases, the lead OIG provides templates for data collection, which can help OIGs collect and report data consistently.

Testing the data for completeness and accuracy

- Build in time to access or request data and to test it for reliability, accuracy, and completeness.
- Provide a forum for sharing data testing procedures, information technology tools, and collectively addressing data challenges.

Ensuring consistent or comparable information within the team

- Conduct routine updates to the OIG team to ensure that information and data are accurate and consistent across agencies.
- For derivative work, the lead OIG should confirm with the OIGs that themes and findings from their published works are summarized and captured accurately.

Reporting



The reporting process for cross-cutting projects consists of several layers of leadership review to ensure that the content is accurate and has sufficient evidence to support the findings, conclusions, and recommendations. The process for preparing and issuing the final cross-cutting report falls into three sections—consolidation, review, and rollout.

Consolidating report content

- Designate one OIG to lead the consolidation effort, which includes pulling all the report content into one document and reviewing the draft to ensure consistency of tone and format.
- Use a report template to maintain consistency of content and structure across the OIGs.
- Include a summary or insights section that brings together the work from all OIGs, keeping in mind the need to balance a collective message and the unique aspects of each agency.
- Establish a process to diligently track and manage various versions of the report to maintain the integrity of the report.

Project Management:

With multiple OIGs working on a project simultaneously, version control can be a challenge. A web-based project management platform—such as SharePoint—can help manage the process as it allows OIGs across departments to maintain, access, write, and edit documents or upload files in one system.

Reviewing the draft report

- Calculate review timelines based on OIGs having different agency comment periods, which need to be de-conflicted and aligned.
- Plan for at least three “review” activities—reviewing each OIG’s content submissions, reviewing the consolidated draft report, and reviewing the final draft.
- Vetting and reviewing drafts across multiple OIGs can take a substantial amount of time.
- Small changes to the report can unintentionally alter the accuracy of statements.

Fact-Check and Referencing Review:

Reviews typically result in edits and different iterations of a draft. To help ensure that all statements are supported by evidence and that data are still accurate, each OIG conducts its own fact-check and references each statement. Similarly, the lead OIG conducts a fact-check of any summary or aggregated information, including charts, graphs, and other data visualizations.

Rolling out the report

- Have one OIG post the report on Oversight.gov to avoid duplicate postings.
- Each OIG works with its communications office to broaden outreach and communication activities with key stakeholders about the final product.
- Collaborate within the OIG team to maintain consistency of content and communication across the OIGs, including social media and messaging to Congressional and external stakeholders. It is helpful to assign a lead OIG to develop this content.

Conducting cross-cutting projects comes with its complexities, can be complicated, take longer than anticipated, and usually fall outside of the “normal” oversight plans prepared by OIGs each year. Nevertheless, the benefits of these projects outweigh the challenges.

APPENDIX 5-A:

Examples of Pandemic-Related Cross-Cutting Products

<i>Report</i>	<i>Issuance</i>	<i>Type</i>	<i>Lead OIG</i>	<i>Participating OIGs</i>
A Review of Pandemic Relief Funding and How It Was Used in Six U.S. Communities: Marion County, Georgia	January 2025	New	PRAC	DOL, ED, HHS, HUD, Treasury, USDA
A Review of Pandemic Relief Funding and How It Was Used in Six U.S. Communities: Sheridan County, Nebraska	September 2024	New	PRAC	DOL, ED, HHS, HUD, Treasury, USDA
A Review of Pandemic Relief Funding and How It Was Used in Six U.S. Communities: Coeur d'Alene, Idaho	July 2024	New	PRAC	DOL, DOT, ED, HHS, HUD, Treasury, USDA
A Review of Pandemic Relief Funding and How It Was Used in Six U.S. Communities: Springfield, Massachusetts	May 2024	New	PRAC	DHS, DOL, DOT, ED, HHS, HUD, Treasury, USDA
Why Unemployment Insurance Fraud Surged During the Pandemic	April 2024	Derivative	PRAC	DOL
Pandemic Relief Experiences: A Focus on Six Communities	March 2024	New	PRAC	DHS, DOI, DOT, DOL, ED, HHS, HUD, Treasury, USDA
Agile Oversight in a Time of Crisis: Lessons Learned and Best Practices in Conducting Oversight during the COVID-19 Pandemic	March 2024	Tool/ Resource	PRAC	AmeriCorps, CIGIE, DOD, DOI, DOJ, DOJ, FDIC, HUD, NASA, SBA, USAID
Review of Personnel Shortages in Federal Health Care Programs During the COVID-19 Pandemic	September 2023	New	DOD	DOD, DOJ, HHS, VA *PRAC-Supported

<i>Report</i>	<i>Issuance</i>	<i>Type</i>	<i>Lead OIG</i>	<i>Participating OIGs</i>
Tracking Pandemic Relief Funds that Went to Local Communities Reveals Persistent Data Gaps and Data Reliability Issues	July 2023	New	PRAC	DHS, DOI, DOT, DOL, ED, HHS, HUD, SBA, Treasury, USDA
Insights on Telehealth Use and Program Integrity Risks Across Selected Health Care Programs During the Pandemic	December 2022	New	HHS OIG	DOD, DOJ, DOL, HHS, OPM, VA *PRAC-Supported
More Than \$2.6 Million in Potentially Fraudulent LWA Payments Were Linked to DHS Employees' Identities	September 2022	New	DHS OIG	DHS, DOL
Risk Advisory: Potential Identity or Other Fraud in SBA Pandemic Programs	September 2022	New	PRAC	HUD, SBA
Key Insights: Identity Fraud Reduction and Redress in Pandemic Response Programs	June 2022	Derivative	PRAC	DOL, ED, GAO, HHS, SBA, SSA, TIGTA, USPS, VA
Key Insights: State Pandemic Unemployment Insurance Program	December 2021	Derivative	PRAC	DOL (plus 16 state audit entities)
Key Insights: COVID-19 Correctional and Detention Facilities	May 2021	Derivative	DOJ OIG	DHS, DOI, DOJ *PRAC-Supported
Federal COVID-19 Testing Report: Data Insights from Six Federal Health Care Programs	January 2021	New	HHS OIG	DOD, DOJ, DOL, HHS, OPM, VA
Agile Products Toolkit	November 2020	Tool/ Resource	PRAC	DHS, DOE, FDIC, SIGTARP, USAID

Note: This table does not include all cross-cutting products that have been issued by federal Offices of Inspectors General. It highlights varied examples of different types of cross-cutting products related to pandemic funding.

APPENDIX 5-B:

Example of an Attestation Template

In accordance with the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE) [or insert applicable standard], the Office of the Inspector General, [insert federal agency] (XXX OIG) has conducted its review of the data submitted in support of [insert project name] and has determined that data are sufficiently reliable for the purpose of a data brief and for display on the www.oversight.gov, or any of the participating OIG websites. XXX OIG also provides reasonable assurance over the methods used to verify the data sources and techniques used to collect, process, and report the data. XXX OIG has disclosed additional information to be included in the Scope and Methodology section of the final [product type].

Methods Used to Verify Data Sources

XXX OIG determined that the data from [insert system or systems used/source of data] are generally reliable based upon the procedures performed relating to the [insert name of funds/programs]. [Insert additional explanation to support or inform this statement.]

Methods Used to Verify Data

[Provide explanation about the steps completed by the OIG to verify/test the data used. This could include normal systems testing of data that the OIG completes if this is a regular system it has access to. This could include verification or corroboration of agency provided data. Etc.]

Known Data Limitations

[Most of the data limitations should be outlined in the Scope and Methodology section to be submitted along with the data template. This section should include a high-level summary of limitations, such as complete data was only available through June 30, 2021, or the agency does not maintain data at the sub-recipient level so totals may not be complete.]

Chapter 5 Team

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PandemicOversight.gov

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Report Fraud, Waste, Abuse, or Misconduct:

To report allegations of fraud, waste, abuse, or misconduct regarding pandemic relief funds or programs please go to the PRAC website at

PandemicOversight.gov.



A Committee of the
Council of the Inspectors General
on Integrity and Efficiency