Assessment of The Financial Crimes Enforcement Network's Strategic Plan for Fiscal Years 1997-2002

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Office of Evaluations

Office of Inspector General

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United States Department of the Treasury

OFFICE OF
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

May 8, 2000

MEMORANDUM FOR JAMES F. SLOAN, DIRECTOR
FINANCIAL CRIMES ENFORCEMENT NETWORK

FROM: Dennis S. Schindel
Assistant Inspector General for Audit

SUBJECT: Assessment of the Financial Crimes Enforcement Network's Strategic Plan for Fiscal Years 1997-2002

The attached final report presents our assessment of the Financial Crimes Enforcement Network's (FinCEN) strategic plan for Fiscal Years 1997 - 2002. The objective of our review was to determine the consistency of this FinCEN strategic plan with the requirements of the Government Performance and Results Act (the Results Act), and the General Accounting Office, Office of Management and Budget, and the Department of the Treasury guidance.

Our analysis are summarized in the Overview and explained in further detail in the Evaluation Results section of the report. Our suggestions to assist FinCEN with its strategic planning are summarized at the end of the report.

We received FinCEN's comments in response to our draft report. We are pleased to note that FinCEN did not need to provide formal comments for inclusion into the report and appreciated the collaborative effort with the Office of Inspector General's (OIG) Office of Evaluations.

It is the OIG policy and practice to make our reports available to the public. In that vein we note that you did not identify any information in the report that would need protection under the Freedom of Information Act.

We appreciate your response and included it as Appendix 2. We would like to extend our appreciation to your managers and staff for their cooperation and courtesies extended to our staff during this assessment.

If you wish to discuss this report, you may contact me at (202) 927-5400 or a member of your staff may contact Christopher Heppe, Deputy Director, Office of Evaluation, at (202) 283-1596.

Attachment

cc: Under Secretary for Enforcement

Assistant Secretary for Management/Chief Financial Officer

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OVERVIEW

This report presents the results of our assessment of the Financial Crimes Enforcement Network's (FinCEN) strategic plan for Fiscal Years 1997 - 2002 for consistency with the requirements of the Government Performance and Results Act (Results Act), and the General Accounting Office (GAO), Office of Management and Budget (OMB), and the Department of the Treasury guidance.

Our assessment revealed that FinCEN's strategic plan for Fiscal Years 1997 - 2002 met the basic requirements of the Results Act along with GAO, OMB, and Treasury guidance. This plan covered a five-year period, described its mission, and linked with one Treasury-wide strategic objective. The plan included FinCEN's goal with five objectives in order to target its results. Key FinCEN executives were involved in developing the plan including consultations with internal and external customers and stakeholders. Finally, FinCEN identified seven key external factors affecting its operations.

FinCEN's first strategic plan meets the key requirements outlined by the Results Act. We cited GAO's analysis that performance information and data may identify gaps in performance and the analysis may be useful details when updating a strategic plan.

We suggest that FinCEN should build on its first strategic plan when making revisions. Since the development of its first strategic plan FinCEN's management has changed, which now provides an excellent opportunity to include any necessary performance information based adjustments.

BACKGROUND

FinCEN and Its Strategic Plan

One of Treasury's strategic departmental goals is to "Combat Financial Crime and Money Laundering"[1]. FinCEN's mission directly supports this departmental goal. The FinCEN document, "FinCEN overview & mission" in the section titled "How has Treasury addressed the problem?" states that the Department of the Treasury designated FinCEN to establish, oversee, and implement policies to prevent and detect money laundering. In its strategic plan, FinCEN recognized this by stating that its mission "*is to support and strengthen domestic and international anti-money laundering efforts*, and *to foster interagency and global cooperation to that end through information collection, analysis and sharing, technological assistance, and innovative and cost-effective implementation of Treasury authorities.*"[2]

FinCEN does not initiate or carry out investigations on its own. Rather, by serving as a central source for financial intelligence information and analysis, FinCEN supports the investigative and prosecutive efforts of numerous law enforcement authorities. The FinCEN document, "FinCEN overview & mission" in the section titled "How has Treasury addressed the problem?" states that FinCEN accomplishes its mission in two ways.

First, it uses anti-money laundering laws to require reporting and record keeping by banks and other financial institutions. This record keeping preserves a financial trail for investigators to follow as they track criminals and their assets. Second, FinCEN provides intelligence and analysis case support and furthers public understanding of money laundering. In addition, FinCEN concentrates on combining information reported under anti-money laundering laws with other government and public information.

FinCEN's strategic plan identified its support of these law enforcement entities. The GAO reported that "FinCEN administers the largest financial transaction reporting system in the world, which is based on recordkeeping and reporting requirements mandated or authorized under

[1] "Department of the Treasury Strategic Plan for Fiscal Years 1997-2002", September 1997.
[2] "FinCEN Strategic Plan for Fiscal Years 1997-2002", September 1997.

the Bank Secrecy Act (BSA)[3], as amended."[4] "Despite its name, the BSA, among other things, is a disclosure law."[5] To supplement the BSA-related financial database, FinCEN procures access to a variety of commercially maintained databases. Through bilateral agreements, FinCEN can access the investigative case databases of various Federal law enforcement agencies.[6]

FinCEN's strategic plan clarified how its support related to FinCEN's mission, goal, and objectives through five principal types of support: (1) *Tactical support* products can be database extracts or analyses of the financial aspects of major criminal organizations; (2) *Strategic support* provides law enforcement officials with intelligence analyses and reports on longer term or broad scoped topics; (3) *Artificial intelligence support* helps identify potential subjects; (4) *On-site tactical self-help* (called a "platform concept") allows access to the BSA financial database and commercial databases; and, (5) *Off-site tactical self-help* (called "Project Gateway" [7]), users have direct access to FinCEN's suspicious activity reports.

FinCEN performs its mission with a Fiscal Year 2000 planned budget of about $29.7 million[8] and budgeted full time equivalent staffing level (as of October 1999) of approximately 183 employees. These employees are permanent FinCEN personnel, mostly intelligence professionals, as well as specialists from the financial industry and computer experts. In addition, about 40 staff persons on long-term details are assigned to FinCEN from different regulatory and law enforcement agencies and these employees and staff are supplemented by a varying number of contractor employees.

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[3] Public Law (P.L.) 91-508, 84 Stat. 1114 (1970). BSA's implementing regulations are promulgated by the Department of the Treasury at 31 C.F.R. Part 103.

[4] "Money Laundering: FinCEN's Law Enforcement Support Role Is Evolving", GAO/GGD-98-117, June 1998.

[5] "Money Laundering: FinCEN Needs to Better Communicate Regulatory Priorities and Time Lines", GAO/GGD-98-18, February 1998.

[6] "Money Laundering: FinCEN's Law Enforcement Support Role Is Evolving", GAO/GGD-98-117, June 1998.

[7] Uses FinCEN designed software to grant on-line access to BSA records to selected law enforcement agencies at the federal, state, and local levels.

[8] $28.4 million in direct appropriations plus $1.3 million from the Violent Crimes Trust Fund, which is administered by the Department of Justice.

The Results Act

In August 1993, Congress enacted the Government Performance and Results Act, which requires Federal agencies to consult Congress and other stakeholders to clearly define their mission. It also requires the Federal agencies to establish long-term strategic goals, as well as annual goals that are linked to the strategic goals. Agencies must measure their performance against those goals they have established, then report on how well they are doing in achieving the goals.

The Results Act shifted Federal agencies' focus away from such traditional concerns as staffing and activity levels and toward a single overriding issue -- results. The GAO[9] stated that there is no more important element in results-oriented management than an agency's strategic planning effort. This effort is the starting point and a foundation. For strategic planning to be done well, GAO reported that three practices appear to be critical. "Organizations must (1) involve their stakeholders; (2) assess their internal and external environments; and (3) align their activities, core processes, and resources to support mission-related outcomes." [10]

Also, identification and discussion of key factors external to the agency could significantly affect achievement of the strategic goals. These key factors include economic, demographic, social, technological, or environmental circumstances. Finally, the Results Act requires each agency to identify/prepare performance measures then report annually on their program performance for the previous fiscal year[11].

A GAO discussion paper, "Strengthening Management Practices", recognized that leading organizations apply several practices to their planning, which include:

- the involvement and support of their top management;
- establishment of a high-level focal point, a unit or individual, to help coordinate the organization's performance management efforts by ensuring consistency and providing training;

[9] "Agencies' Strategic Plans Under GPRA: Key Questions to Facilitate Congressional Review", GAO/GGD-10.1.16, May 1997.
[10] "Executive Guide: Effectively Implementing the Government Performance and Results Act", GAO/GGD-96-118, June 1996.
[11] The first report is due by March 31, 2000 for Fiscal Year 1999.

- performance agreements and appraisals, establishment of results accountability and responsibility and provide incentives for achieving results;
- involvement of the organization's customers and any organizations/entities, which they regulate/oversee; and
- coordination of their program activities and linkage of their goals and strategies with those goals and strategies of partners or related organizations.

The Results Act required that Federal agencies, no later than September 30, 1997, develop strategic plans covering a period of at least 5 years and submit them to Congress and OMB. Strategic plans are intended to be the starting point for agency performance measurement efforts. The strategic plans must include a comprehensive mission statement based on the agencies' statutory requirements, outcome-related strategic goals, and a description of how the agencies intend to achieve those goals. The mission statement brings the agency into focus because it: (1) explains why the agency exists, (2) tells what it does, and (3) describes how it does it. The strategic goals are an outgrowth of this stated mission. The strategic objectives explain the purpose of the agency's programs and the results they are intended to achieve.

OBJECTIVE, SCOPE AND METHODOLOGY

Our review was to evaluate FinCEN's strategic plan for Fiscal Years 1997 - 2002 for consistency with the requirements of the Results Act, and GAO, OMB, and the Department of the Treasury guidance. This report should assist FinCEN with continuing enhancements of its strategic planning process.

Our analysis included reviewing FinCEN's strategic plan for Fiscal Years 1997 - 2002 and its Fiscal Years 1999 and 2000 budget submissions. We also reviewed House subcommittee hearings; FinCEN reports on its international activities; various public domain documents, studies, or reports; and various GAO and Office of Inspector General (OIG) Results Act guidance documents and GAO and OIG reports on FinCEN's functions and activities.

We interviewed FinCEN's officials from its operational offices, however, the current officials from its Office of Management and many of its other operational offices were not the officials involved in the development of FinCEN's original strategic plan. We also interviewed Treasury officials from the Office of Strategic Planning and Congressional, OMB and GAO staff.

We interviewed eight law enforcement liaison representatives from different agencies, who are currently at FinCEN coordinating their agencies' requests for investigative research. These liaisons coordinate the investigative case research submitted to their agencies. These liaisons do rotate and may not have been at FinCEN when the first strategic plan was developed. The agencies were the Bureau of Alcohol, Tobacco and Firearms, the Defense Criminal Investigative Service, the Drug Enforcement Administration, the Federal Bureau of Investigation, the Internal Revenue Service's (IRS) Criminal Investigative Division, Naval Criminal Investigative Service, United States Capitol Police, and the United States Customs Service.

The OIG, Office of Evaluations conducted a review of FinCEN's strategic plan under the Results Act. We conducted our fieldwork between October 1998 and February 1999 in accordance with the President's Council on Integrity and Efficiency Quality Standards for Inspections. During our review, we interviewed current officials in the Office of Management and most of the operational offices.

Subsequently, we learned that due to changes within the Office of Management during the time the first strategic plan was developed, the Office of Communications assumed responsibility for the plan's development. At the request of FinCEN officials, we interviewed officials from the Office of Communications, Office of Information Technology, and the Office of Management in January 2000. We also reviewed supporting documents, which the Office of Communications provided. We conducted our evaluation at FinCEN headquarters in Vienna, VA and through the review of available documents.

EVALUATION RESULTS

FinCEN's strategic plan meets the Results Act requirements, because it: expresses FinCEN's comprehensive mission statement, which appears to be based on its statutory requirements; defines its goal in outcome terms; details its objectives including descriptions for achieving its five objectives; identifies its key external factors; and covers the required five year time frame. While not required to be included in the strategic plan, FinCEN did include a number of output performance measures. *Section I*, which follows below, provides enhanced details.

Initially, we believed, FinCEN's planning process did not involve many FinCEN officials, stakeholders, and customers. The Office of Management did not provide documentation on the process FinCEN used to develop its strategic plan and input from most of its officials and employees, stakeholders and customers. Subsequently, we learned FinCEN's Office of Communication coordinated the development of its strategic plan and involved several of FinCEN's officials, stakeholders, and customers. *Section II*, which follows below, provides additional detail.

We observed that the results of the strategic planning process were used in other reporting documents, such as budgeting, systems or network justifications, and summaries of FinCEN's work products. We did not review the elements of FinCEN's output performance measures identified in the strategic plan. We were informed that the performance measures were being revised to be more outcome oriented and for inclusion in the annual performance plan; therefore, we did not develop an opinion as to the adequacy of the performance measures contained in the strategic plan.

Section I When assessed against the Results Act and GAO delineated criteria, we believe that: **FinCEN's Strategic Plan For Fiscal Years 1997 - 2002 Fulfilled Basic Criteria**.

The Results Act's strategic plan is intended to be the starting point for an agency's performance measurement efforts. The strategic plan must include a comprehensive mission statement based on the agency's statutory requirements, outcome-related strategic goals, and a description of how the agency intends to achieve its goals. The mission statement brings the agency into focus because it: (1) explains why the agency exists, (2) tells what it does, and (3) describes how it does it. The strategic goals are an outgrowth of this stated mission. The strategic objectives explain the purpose of the agency's programs and the results they are intended to achieve. Finally, the identification of internal and external forces, which can influence an agency's ability to achieve its goals, needs to be supported by more than anecdotal or informal information.

GAO identified[12] that successful organizations monitor their internal and external environments and have shown an ability to anticipate future challenges and to make adjustments. In addition, GAO said that managers striving to reach organizational goals must have information systems in place to provide them with needed information; however, the Federal Government's basic financial and information management systems are woefully out of date and incapable of meeting modern needs for fast, reliable, and accurate information.

FinCEN's Strategic Plan Contains the Basic Requirements

FinCEN submitted its strategic plan to Treasury's Secretary on September 19, 1997, which met the Results Act requirement that Federal agencies, no later than September 30, 1997, develop strategic plans covering a period of at least 5 years. FinCEN's Strategic Plan:

[12] "Executive Guide: Effectively Implementing the Government Performance and Results Act", GAO/GGD-96-118, June 1996.

1. covered at least 5 years;
2. described its mission - *to support and strengthen domestic and international anti-money laundering efforts and to foster interagency global cooperation to that end through information collection, analysis and sharing, technological assistance, and innovative and cost-effective implementation of Treasury authorities*; and
3. linked with the Treasury-wide strategic plan objective -- *to strengthen the capability to fight money laundering*.

Next, FinCEN's goal -- *providing law enforcement support through information analysis and the creation of new information resources for the prevention, detection, and prosecution of money laundering* -- flowed directly from its mission statement. The Strategic Plan's five objectives converted the goal into an explanation of the purpose of FinCEN's programs and activities and the results they are intended to achieve. The goal and five objectives target results that FinCEN had been tasked with accomplishing and had a reasonable expectation for achieving.

The first objective is *for direct law enforcement support -- to operate a broad-based network for timely information-sharing*. FinCEN provides law enforcement assistance with: (1) direct case support with investigative information; (2) on-site tactical self-help through Platform Access; (3) artificial intelligence through the Artificial Intelligence Targeting System; (4) support to the Interagency Coordination Group[13]; and (5) off-site tactical self-help through Project Gateway.

The second objective is *to use state-of-the-art technology for information sharing and analysis*. FinCEN reports while working closely with its stakeholders in the law enforcement, regulatory, and financial communities, it strives to refine reporting systems to ensure data is of real benefit to law enforcement and minimizes the burden for financial institutions.

The third objective is *to build new law enforcement resources through effective use of the BSA*. FinCEN is expanding the BSA beyond the banking industry by focusing on another category of businesses called money services businesses (MSB). MSBs refer to five distinct types of

[13] Whose purpose is to share money laundering intelligence to promote multi-agency money laundering investigations.

financial services: (1) money transmitters; (2) issuers of traveler's checks or money orders; (3) sellers or redeemers of traveler's checks or money orders; (4) check cashers; and (5) retail currency exchanges. The MSBs have increasingly become the targets of money launderers. To continue to challenge the financial criminal on all fronts, FinCEN states that it must provide quality information to law enforcement by improving existing sources of information and developing new resources. As part of this effort, FinCEN has developed strategies to increasingly use the BSA in this endeavor.

The fourth objective is *to build law enforcement resources through focused and sophisticated analysis of elements of major cases and of trends and patterns of money laundering and related financial crimes*. To this end, FinCEN provides an interagency forum for the study and presentation of major, multi-jurisdictional money laundering investigations in which new trends and methods are identified.

The fifth objective is *to strengthen international anti-money laundering efforts*. FinCEN is developing and fostering multilateral and bilateral initiatives aimed at whittling down the number of countries who are not cooperatively engaged in the fight against money laundering.

External Factors Affecting FinCEN's Operations

To meet its mission, goal, and objectives, FinCEN identified these seven key external factors:

1. *the role of the IRS*, which maintains the BSA database with significant level of staff and financial support for anti-money laundering programs and to BSA compliance. Also the IRS possesses authority to examine casinos and MSBs for compliance with respect to anti-money laundering laws.

2. *state-of-the-art technology*, allows FinCEN to rapidly adapt to changes in money laundering activities, analyze data, identify trends and patterns, and develop domestic and international anti-money laundering programs.

3. *new legislation*, unforeseen legislative developments, or legal challenges could impact the value of BSA authority.

4. *rapid expansion of financial services and products* creates revolutionary changes, which breakdown the traditional walls between types of financial institutions that currently support the financial community.

5. *delegation of civil penalties authorities to regulators* need to be resolved to ensure consistent regulation of civil penalties by all regulatory or oversight agencies.

6. the *importance of global anti-money laundering measures* are even more evident in view of the borderless world of today's international financial systems and that dirty money gravitates towards regions or countries with no or little safeguards against money laundering.

7. *resource level* changes in one area would adversely impact the other areas due to the close linkage between law enforcement, regulatory, and international efforts.

FinCEN's Strategic Plan Included Input From Customers and Stakeholders

The Results Act stresses the need for meaningful internal and external involvement in the agency's strategic planning process. In 1997, the Office of Communications prepared FinCEN's first strategic plan and included a number of key officials in the process. At present, FinCEN's Office of Management is directing its strategic planning process and is coordinating FinCEN's Results Act activities. A strategic planning staff coordinates and integrates feedback and input from various internal and external customers and stakeholders towards maintaining its cohesive and viable strategic plan.

We attempted to examine documentation and to contact external customers and stakeholders, who were consulted during the strategic plan development. Due to the length of time between the plan's development and our review, either the documentation was not available or the individuals identified as the consultant could not be reached. Upon our request, the Office of Communications identified and provided sample documents for us to review in January 2000. These documents indicated that several FinCEN officials, external customers, and stakeholders were consulted.

We also attempted to obtain the involvement of various non-Treasury agencies on FinCEN's strategic plan and the processes that FinCEN used in developing that plan. We contacted GAO, OMB, and the House Subcommittee on General Oversight and Investigations of the Committee on Banking and Financial Services. One GAO assistant director issued three reports and developed congressional testimony dealing with FinCEN's primary responsibilities. While the GAO documents were issued after FinCEN developed its first strategic plan, we used these reports to help obtain an understanding of FinCEN's overall mission, strategic goals, and objectives in light of its environment and challenges.

The GAO assistant director suggested that we could rely on the information contained in GAO testimony, "Money Laundering: FinCEN's Law Enforcement Support, Regulatory, and International Roles", GAO/T-GGD-98-83, April 1, 1998 and three GAO reports: (1) "Money Laundering: FinCEN Needs to Better Communicate Regulatory Priorities and Time Lines", GAO/GGD-98-18, February 6, 1998; (2) "Money Laundering: FinCEN Needs to Better Manage Bank Secrecy

Act Civil Penalty Cases", GAO/GGD-98-108, June 15, 1998; and (3) "Money Laundering: FinCEN's Law Enforcement Support Role Is Evolving", GAO/GGD-98-117, June 19, 1998.

To supplement the GAO information, we interviewed liaisons from eight law enforcement agencies, which were either located at FinCEN's offices or used its resource information remotely. Our structured interviews with these liaisons revealed that they generally believe FinCEN provides their agencies with invaluable data and analysis to support their investigations. Most of these liaisons, however, commented that FinCEN should reduce the amount of time required for responding to their requests for data and analyses. We noted that FinCEN did identify timeliness as a challenge in its strategic plan.

In addition, none of the liaisons were aware of their agency having had any input or involvement with the development of FinCEN's strategic plan. We recognize that these liaisons do rotate and may not have been at FinCEN when the first strategic plan was developed. While these agencies' liaisons were not consulted as stakeholders or customers of FinCEN resources and services, we were informed that FinCEN's strategic plan was coordinated with members of its standing working and advisory groups such as the Money Laundering Working Group and the Bank Secrecy Act Advisory Group.

Subsequently, we were informed that its Office of Communications coordinated the development of FinCEN's original strategic plan and provided us documentation that identified FinCEN's officials involvement in its development process. In addition, the Office of Communications coordinated with: (1) interested Treasury staffs; (2) working and advisory groups, such as the Money Laundering Working Group and the Bank Secrecy Act Advisory Group; and (3) interested congressional staff, who provided positive comments and provided useful suggestions, according to Office of Communications officials.

The Office of Communications officials informed us that during coordination with interested congressional committees, one congressional staff requested information on actual performance measures, although these measures were not required for inclusion in the strategic plan.

Section II When applying the most current Results Act guidance and criteria, we believe that: **FinCEN Could Enhance Its Plan With Performance Information.**

FinCEN's first strategic plan meets all of the basic requirements and could benefit from the information provided in its annual performance report. FinCEN's strategic plan could build on its foundation by enhancing its process with information from its performance report.

Using Performance Information To Strengthen Strategic Planning

The GAO reported in its document, "Executive Guide: Effectively Implementing the Government Performance and Results Act", GAO/GGD-96-118 that leading organizations progressed farthest to results-oriented management if they did not stop after strategic planning and performance measurement.

These leading organizations applied their acquired knowledge and data to identify gaps in their performance, report on that performance, and finally use that information to improve their performance. In addition, they used this knowledge and data as one part of their input when they updated their strategic plans.

OBSERVATIONS

FinCEN's Strategic Plan for Fiscal Years 1997 - 2002 was a good first step in implementing the requirements of the Results Act but will need to be updated in the coming years to comply with the Results Act's requirements for regular updates. While the Results Act did not require performance measures as part of the first strategic plans, FinCEN did identify and include several output measures. With the requirement that performance measures be developed for the annual performance plans, we did not review them.

For various unrelated reasons FinCEN's management has changed since the development of its first strategic plan. Maintaining sufficient documentation of the steps and processes that FinCEN employs to update the strategic plan will provide support for others to follow FinCEN's strategic planning process with the next update of the strategic plan. With sufficient documentation and information available, the potential exists for FinCEN to save resources when updating its strategic plan.

From our interviews with the law enforcement agencies liaisons, most stated they believed FinCEN should reduce the amount of time required for responding to requests for data and analysis. In addition, future FinCEN strategic plan processes could benefit from feedback on its implementation of its projects, process, and individual requests.

SUGGESTIONS

FinCEN should build on the base that it established in its first strategic plan by enhancing the process with information from its performance report. The next milestone will be the annual performance plan, which is the first assessment under that plan. FinCEN should use information from its first performance report to fine-tune its strategic plan. Reports from its Management Information System, which coordinated access to its databases, were established to assist in measuring its performance and could provide information to update FinCEN's strategic plan.

ABBREVIATIONS

Bank Secrecy Act	BSA
Financial Crimes Enforcement Network	FinCEN
General Accounting Office	GAO
Internal Revenue Service	IRS
Money Services Businesses	MSBs
Office of Inspector General	OIG
Office of Management and Budget	OMB
Public Law	P.L.
The Government Performance and Results Act of 1993	Results Act

MANAGEMENT RESPONSE

DEPARTMENT OF THE TREASURY
FINANCIAL CRIMES ENFORCEMENT NETWORK

MAR 27 2000

MEMORANDUM FOR DENNIS S. SCHINDEL
Assistant Inspector General for Audit
Office of Inspector General

FROM: Nicholas Procaccini
Assistant Director (Management/CFO)

SUBJECT: Assessment of the Financial Crimes Enforcement Network's Strategic Plan for Fiscal Year 1997-2002

Thank you for the opportunity to comment on the revised draft provided on March 13, 2000. The Office of Evaluations has worked with us to make this report a useful document, and we appreciate this type of collaborative effort. As a result, we will not provide any formal comments for inclusion in the report.

As requested, there is nothing in this report that needs protection under the Freedom of Information Act.

cc: Rick Bert