SUMMARY AND ANALYSIS OF DELAY REPORTS TO CONGRESS ON FHFA-OIG INQUIRY

Date	Summary of IC's Actions
December 2017	First mention of #912. Requested response to allegations "from the subject."
January 2018	Requested response to allegations "from the subject."
February 2018	Requested response to allegations from the subject, and IC "is or will be" evaluating the response.
March 2018	#912 is not referenced.
July 2018	Investigators need to complete requested interviews and review numerous documents.
August 2018	Investigators need to complete requested interviews and review numerous documents. "Part of the delay resulted from the subject OIG's assertion that the IC does not have access to nonpublic information and information protected by the attorney-client privilege, including witnesses who might possess such information. The IC has been able to resolve the access issue."
September 2018	Investigators need to complete requested interviews and review numerous documents. Does not mention access resistance.
October 2018	Investigators need to complete requested interviews and review numerous documents. Again, does not mention access resistance.
November 2018	Investigators need to complete requested interviews and review numerous documents.
December 2018	Investigators need to complete requested interviews and review numerous documents.
January 2019	Investigators need additional time "to complete the investigation."
February 2019	Investigators need to complete requested interviews and review numerous documents.
March 2019	"IC needs additional time to address a lack of cooperation by the subject and the office to produce documents and allow witness interviews; we will notify the [Congressional] Committees if we are unable to resolve quickly."
April 2019	"IC needs additional time to address a lack of cooperation by the subject and the office to produce documents and allow witness interviews, in addition to delays from a recent health issue involving the subject."
May 2019	"IC needs additional time to address a lack of cooperation by the subject and the office to produce documents and allow witness interviews, in addition to delays from a recent health issue involving the subject."
June 2019	IC needs additional time for investigators to draft the report of investigation, "in addition to delays from a recent health issue involving the subject."

July 2019	IC needs additional time for investigators to draft the report of investigation.
August 2019	IC needs additional time for investigators to draft the report of investigation.
September 2019	IC needs additional time to review the draft report of investigation "prior to sending it to the subjects for comment." Up until this point IC's reports used the term "subject" (singular) or "subject and the office."
October - December 2019; February - December 2020	Reports do not reference #912. A reasonable inference is that IC sent the draft report to the "subjects" and it thus considers it to be beyond the 150-day reporting requirement. This point is supported by footnote #1 of the IC's January 2021 delay report. A key question is whether CIGIE was waiting for the subjects at the FHFA-OIG to comment on the report for 15 months, from October 2019 through December 2020, or is there another explanation for this delay?
January 2021	#912 is "in post-investigation review by the respondent and the IC."
February 2021	#912 is "in post-investigation review by the respondent and the IC."
March 2021	#912 is "in post-investigation review by the respondent and the IC."