



Office of Inspector General
U. S. Consumer Product Safety Commission

External Peer Review Report
December 16, 2019

To Norbert E. Vint, Deputy Inspector General Performing the Duties of the Inspector General, Office of Inspector General, U.S. Office of Personnel Management

This required external peer review was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Inspection and Evaluation Committee guidance as contained in the CIGIE *Guide for Conducting Peer Reviews of Inspection and Evaluation Organizations of Federal Offices of Inspector General*, September 2019. The peer review was conducted from October 7, 2019 through December 16, 2019.

The CIGIE External Peer Review Team (Review Team) assessed the extent to which Office of Personnel Management (OPM) Office of Inspector General (OIG) met CIGIE *Quality Standards for Inspection and Evaluation* (Blue Book) standards, January 2012, specifically: Quality Control; Planning; Data Collection and Analysis; Evidence; Records Maintenance; Reporting; and Followup. This assessment included a review of the OPM OIG's internal policies and procedures implementing the seven required CIGIE Blue Book standards. It also included a review of selected inspection and evaluation reports issued between July 1, 2017 through June 30, 2019, to determine whether the reports complied with the seven covered Blue Book standards and the OPM OIG's internal policies and procedures. The Review Team determined that the OPM OIG's policies and procedures generally met the seven Blue Book standards addressed in the external peer review. The two reports reviewed generally met the Blue Book standards and complied with OPM OIG's internal policies and procedures.

We have issued a Letter of Comment dated December 4, 2019 (Enclosure 1) that sets forth specific findings, recommendations, observations, suggestions, and best practices identified during the peer review. The OPM OIG management officials provided a written response to our Summary Report (Enclosure 2) in which they concurred with our conclusions.

CHRISTOPHER DENTEL

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Safety Commission, cn=CHRISTOPHER DENTEL,
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Christopher W. Dentel, Inspector General

ENCLOSURE 1: Letter of Comment, Scope and Methodology

The Review Team selected the following two reports for review: Retirement Services Imaging Operations, 4K-RS-00-17-039, dated March 14, 2018; and Evaluation of the U.S. Office of Personnel Management's Preservation of Electronic Records, 4K-CI-00-18-009, dated December 21, 2018. The peer review period was July 1, 2017 – June 30, 2019. Two reports were published during the review period and both were chosen. The Review Team conducted onsite visits on October 7 and November 4.

RESULTS AND FINDINGS

INTERNAL POLICIES AND PROCEDURES: Based on the Review Team's assessment, if implemented, the OPM OIG's policies and procedures sufficiently address the seven required Blue Book standards.

COMPLIANCE WITH STANDARDS: The following is a summary of the Review Team's assessment of the two OPM OIG reports against the seven Blue Book standards included in this review. We found no evidence of non-compliance with the seven Blue Book standards. The CIGIE standards for inspection work are the following:

QUALITY CONTROL: *"Each OIG organization that conducts inspections should have appropriate internal quality controls for that work."* Key elements of this standard include establishing mechanisms for quality control, documenting those mechanisms, and ensuring adequate supervision.

Finding: The reviewed reports met both the Quality Control standard and the associated internal policies and procedures.

PLANNING: *"Inspections are to be adequately planned."* Key elements of this standard include creating a work plan, coordination (both internal and external), and research.

Finding: The reviewed reports met both the Planning standard and the associated internal policies and procedures.

DATA COLLECTION AND ANALYSIS: *"The collection of information and data will be focused on the organization, program, activity, or function being inspected, consistent with the inspection objectives, and will be sufficient to provide a reasonable basis for reaching conclusions."* This standard requires covered I&E organizations to describe the project's sources of data and information in the supporting documentation, ensure information is appropriately scoped, employ procedures to ensure data reliability and validity, and ensure that the confidentiality of sources and sensitive

information is safeguarded. Key elements of the standard related to data analysis include ensuring that data is reviewed for accuracy and reliability, information is appropriately presented and documented, procedures provide for supervisory review, and findings satisfy objectives.

Finding: The reviewed reports met both the Data Collection and Analysis standard and the associated internal policies and procedures.

Suggestion: It was difficult to find where the team documented their review and determination that the data collected was sufficiently accurate and reliable to address the inspection objectives. We suggest adding a separate step to address this standard.

EVIDENCE: *"Evidence supporting inspection findings, conclusions, and recommendation should be sufficient, competent, and relevant and should lead a reasonable person to sustain the findings, conclusions, and recommendations."* Key elements of this standard include ensuring that evidence is sufficient to persuade a knowledgeable person of the validity of the related Findings and Recommendations, is collected and evaluated using reasonable methods, and has a logical relationship to the issue(s) being addressed.

Finding: The reviewed reports met both the Evidence standard and the associated internal policies and procedures.

RECORDS MAINTENANCE: *"All relevant documentation generated, obtained, and used in supporting inspection findings, conclusions, and recommendations should be retained for an appropriate period of time."* Key elements of this standard include ensuring that supporting information is effectively organized, provides a record of the nature and scope of the inspection, and provides sufficient information for supervisors to manage and evaluate staff; and that the organization has policies and procedures for document retention.

Finding: The reviewed reports met both the Records Maintenance standard and the associated internal policies and procedures.

Observation(s): Draft OIG Records Schedule was approved by NARA on October 3, 2019 (Records Schedule Number DAA-0478-2019-0002).

REPORTING: *"Inspection reporting shall present factual data accurately, fairly, and objectively and present findings, conclusions, and recommendations in a persuasive manner."* Key elements of this standard include ensuring that reporting is timely, accurate, and objective; provides sufficient context, describes objectives, scope, and methods; uses clear and concise language; and includes a statement that the inspection was conducted in accordance with the standards. The standard also requires that findings are supported by evidence, conclusions are logical inferences, and recommendations describe what should be corrected.

Finding: The reviewed reports met both the Reporting standard and the associated internal policies and procedures.

FOLLOW-UP: *"Appropriate follow-up will be performed to ensure that any inspection recommendations made to Department/Agency officials are adequately considered and appropriately addressed."* Key elements of this standard include that the I&E organization determines whether agency officials take action to correct problems, performs follow-up work as appropriate to verify management actions, and considers prior recommendations and need for follow-up when planning and conducting new inspections.

Finding: The reviewed reports met both the Follow-up standard and the associated internal policies and procedures.

Enclosure 2



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Office of the
Inspector General

December 9, 2019

The Honorable Christopher W. Dentel
Inspector General
U. S. Consumer Product Safety Commission
4330 East-West Hwy
Suite 702
Bethesda, MD 20814

Thank you for the opportunity to provide comments on the draft results of your peer review of our Office of Evaluation's operations. We are pleased that this external peer review has confirmed that the Office of Evaluation's policies and procedures and the two sampled reports that were within the scope of this peer review met the seven standards from the CIGIE *Quality Standards for Inspection and Evaluations* (Blue Book); quality control, planning, data collection and analysis, evidence, records maintenance, reporting, and follow-up.

We concur with the peer review team's observations during the course of this review as we are committed to conducting high-quality evaluations. We appreciate the professionalism your team displayed during the review.

Sincerely,

A handwritten signature in black ink, appearing to read "Norbert E. Vint".

Handwritten initials "NEV" in black ink.
Norbert E. Vint
Deputy Inspector General
Performing the Duties of the
Inspector General