

**EXTERNAL QUALITY ASSESSMENT REVIEW
OF THE OFFICE OF INSPECTOR GENERAL FOR
U.S. OFFICE OF PERSONNEL MANAGEMENT
INVESTIGATIVE OPERATIONS**

January 19, 2023

Conducted in Washington, D.C.

By:

**Tennessee Valley Authority Office of the Inspector General
Ben Wagner, Inspector General
Nancy Holloway, Assistant Inspector General, Investigations
Meagan Sands, Special Agent in Charge
Ryan Wilson, Assistant Special Agent in Charge**

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Office of the Inspector General

Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1401

Ben R. Wagner
Inspector General

COMPLIANT RATING

Report on the External Qualitative Assessment Review

January 19, 2023

The Honorable Krista A. Boyd
Inspector General
U.S. Office of Personnel Management
Office of the Inspector General
1900 E Street, NW; Room 6400
Washington, DC 20415-1100

**Subject: Report on the External Quality Assessment Review of the Office
of Inspector General for U.S. Office of Personnel Management
Investigative Operations**

Dear Ms. Boyd:

We have reviewed the system of internal safeguards and management procedures for the investigative operations of the U.S. Office of Personnel Management (OPM) Office of the Inspector General (OIG) in effect for the period ended October 31, 2022. Our review was conducted during December 5-8, 2022, in Washington, D.C., in conformity with the Quality Standards for Investigations and the Qualitative Assessment Review Guidelines established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE), and the Attorney General Guidelines (AGG) for the Office of Inspectors General with Statutory Law Enforcement Authority, as applicable.

The Honorable Krista A. Boyd
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We reviewed compliance with the OPM OIG system of internal policies and procedures to the extent we considered appropriate. The review was conducted at the Washington, D.C., headquarters location. Additionally, we sampled 55 investigations closed since the last Peer Review and interviewed OPM OIG staff.

In performing our review, we also gave consideration to the AGG for Office of Inspectors General with Statutory Law Enforcement Authority and Section 6(e) of the Inspector General Act of 1978, as amended. Those documents authorize law enforcement powers for eligible personnel of each of the various Offices of Inspectors General. Law enforcement powers may be exercised only for activities authorized by the IG Act, other statutes, or as expressly authorized by the Attorney General.

In our opinion, the system of internal safeguards and management procedures for the investigative function of the OPM OIG in effect for the review period ending October 31, 2022, was in compliance with the Quality Standards established by the CIGIE and the other applicable guidelines and statutes cited above. These safeguards and procedures provide reasonable assurance of conforming to professional standards in the planning, execution, and reporting of its investigations and in the use of law enforcement powers.

Sincerely,



Ben R. Wagner
Inspector General

cc: Mr. Alan F. Boehm
Executive Director
Council of the Inspectors General on Integrity and Efficiency
1717 H Street, NW; Suite 825
Washington, DC 20006

Mr. Merrick B. Garland
Attorney General
CIGIE Investigative Peer Review
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

ATTACHMENT A – LISTING OF VISITED FIELD OFFICES

The Peer Review was conducted at the U.S. Office of Personnel Management (OPM) Office of the Inspector General (OIG) headquarters located in Washington, D.C. In addition to its headquarters location, OPM OIG has regional investigative personnel located in various locations throughout the country.

Tennessee Valley Authority OIG spoke to various investigative personnel, in person and by phone, based on locale and availability. We found that the individuals interviewed were receiving adequate support and proper oversight.

ATTACHMENT B: LISTING OF CLOSED INVESTIGATIVE FILES REVIEWED

Date Closed	Case Number
09/21/22	2022-01070
09/21/22	2022-02674
09/13/22	2021-00792
08/31/22	2022-01528
08/11/22	C-20-00378
08/08/22	2022-02234
08/02/22	2022-01997
07/26/22	I-21-00049
07/19/22	2022-01300
06/29/22	2021-02085
06/28/22	2021-02043
06/03/22	I-16-00660
05/05/22	2021-01322
05/03/22	2021-01990
04/22/22	I-19-00256
04/20/22	I-20-00431
03/18/22	2021-01909
03/16/22	2021-00535
03/14/22	I-18-00187
02/24/22	I-19-00177
01/25/22	2021-01187
12/15/21	C-21-00004
12/13/21	I-19-00414
12/08/21	I-19-00311
11/30/21	C-20-00237
11/18/21	I-19-00305
10/18/21	H-21-000367
10/14/21	C-20-00380

Date Closed	Case Number
10/07/21	I-21-00044
09/16/21	C-20-00112
09/13/21	2021-00510
08/12/21	2021-01736
07/29/21	C-20-00481
06/01/21	I-16-00084
05/24/21	C-20-00512
05/11/21	C-20-00512
04/14/21	I-19-00104
03/25/21	I-20-00231
12/17/20	I-15-01574
12/16/20	I-21-00050
12/07/20	I-19-00337
12/02/20	C-21-00073
10/28/20	I-19-00022
02/27/20	I-17-00074
02/06/20	I-14-00865
01/15/20	C-19-00055
12/05/19	I-14-00144
03/14/19	I 2011 00832
07/24/18	I 2006 00045
02/21/18	I-15-02451
08/02/17	I-15-01451
05/15/17	I 2011 00008
12/09/16	I 2009 00030
11/14/16	I 2011 00723
10/11/16	I-14-00458
55	

ATTACHMENT C: INSPECTOR GENERAL RESPONSE



Office of the
Inspector General

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

January 12, 2023

The Honorable Ben R. Wagner
Inspector General
Tennessee Valley Authority
Office of the Inspector General
400 West Summit Hill Drive, WT 2C
Knoxville, TN 37902

Dear Mr. Wagner,

Thank you for your January 10, 2023, letter on the Qualitative Assessment Review (QAR) of the Investigative Operations of the U.S. Office of Personnel Management (OPM) Office of the Inspector General (OIG). We are pleased with your conclusions that: (1) OPM is in compliance with the Quality Standards established by the Council of the Inspectors General on Integrity and Efficiency and (2) our safeguards and procedures provide reasonable assurance that we are performing to professional standards in the planning, execution, and reporting of our investigations.

Thank you also for the supplemental letter of the QAR Report that contained observations and two areas for potential process improvements. As noted in your letter, the OPM OIG made these improvements in the form of updated policies and procedures during the QAR. We will endeavor to continue to identify areas for improvement in our mission to protect OPM programs and operations from fraud, waste, or abuse.

I commend Assistant Inspector General for Investigations Nancy J. Holloway and the review team for conducting a thorough review and providing valuable insights to help the OPM OIG strengthen our operations. Please extend my appreciations and praise for a job well done. If my office can assist you in the future, or if you would like to discuss the draft report further, please contact me at 202-606-1200, or a member of your staff may contact Assistant Inspector General for Investigations Drew M. Grimm at 202-606-4730.

Sincerely,

A handwritten signature in cursive script that reads "Krista A. Boyd".

Krista A. Boyd
Inspector General



Office of the Inspector General

Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1401

Ben R. Wagner
Inspector General

January 19, 2023

The Honorable Krista A. Boyd
Inspector General
U.S. Office of Personnel Management
Office of the Inspector General
1900 E Street, NW; Room 6400
Washington, DC 20415-1100

Subject: Letter of Observations following the Report on the External Quality Assessment Review of the U.S. Office of Personnel Management Investigative Operations of the Office of the Inspector General

Dear Ms. Boyd:

This is a supplement to our Report on the External Quality Assessment Review of the U.S. Office of Personnel Management (OPM) Investigative Operations of the Office of the Inspector General (OIG) dated January 8, 2023.

In addition to reporting a rating of Compliant, the peer review team identified areas for potential improvement, which do not impact your office's compliance rating.

In particular, the reviewers observed the following areas for potential process improvements:

1. FBI letters were issued appropriately, generally within 30 calendar days, as required by the Attorney General Guidelines (AGG) Section VII-A Office of Inspector General/Federal Bureau of Investigation Mutual Notification Requirements. However, the reviewing team noted they were not always issued to the district in which the investigation was being conducted as specified by the AGG. Rather, they were issued to FBI Headquarters as part of an automated notification process. Due to the automated nature of this process, there were isolated instances when the letters were not issued within 30 calendar days. The reviewing team additionally noted instances where the notifications did not include required information such as: subject date of birth, social security number, and the allegation that predicated the case.

Resolution: During the course of the Peer Review, OPM OIG updated their respective policy and procedures to ensure all requirements of AGG Section VII-A were incorporated into their procedures and that their practices reflected this accordingly. Further, OPM OIG created template letters for individual district/regional FBI offices for incorporation into their automated notification process.

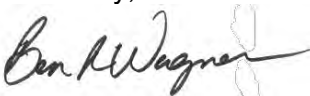
2. OPM OIG policy appropriately addressed predicated investigations; however, the reviewing team noted administrative investigations were not specifically addressed outside of predicated investigation language. OPM OIG policy addressed preliminary and full investigations and their respective initiation based on articulable fact that reasonably indicates an activity constituting a federal crime has or may have occurred, is or may be occurring, or will or may occur. It was noted however by the review team that though administrative violations of regulation or policy were referenced, they were not defined or specified.

Resolution: During the course of the Peer Review, OPM OIG updated their respective policy and procedures to ensure policy language was defined appropriately. This included revision of definitions for preliminary and full investigations and those categories beyond criminal predication such as administrative investigations.

We hope you find these recommendations helpful. We note that implementation of the recommendations were done at your discretion and will not be tracked or monitored by the review team.

If you or your staff have any questions concerning these observations, please feel free to contact our staff directly. Special Agent in Charge Meagan Sands can be reached directly at (██████████) and Assistant Special Agent in Charge Ryan Wilson can be reached directly at ██████████

Sincerely,



Ben R. Wagner
Inspector General