Quality Standards for Federal Offices of Inspector General



President's Council on Integrity and Efficiency

Executive Council on Integrity and Efficiency

October 2003

Foreword

On the 25th anniversary of the enactment of the Inspector General Act of 1978, as amended, the members of the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE) have updated the *Quality Standards for Federal Offices of Inspector General*. To commemorate the anniversary, we are issuing this update with a silver cover. The standards in the Silver Book set forth the overall quality framework for managing, operating, and conducting the work of Offices of Inspector General and will guide the Inspector General Community's efforts into the future.

Gaston L. Gianni, Jr. Vice Chair, PCIE

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Quality Standards for Federal Offices of Inspector General

I. Introduction

A. Purpose

This document contains quality standards for the management, operation, and conduct of the Federal Offices of Inspector General (OIG). Executive Order 12805 gives the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE)¹ the responsibility for developing professional standards for OIGs.² The members of the PCIE and ECIE have formulated and adopted these standards. They are for OIG use to guide the conduct of official duties in a professional manner. These standards incorporate by reference the existing professional standards for audit, investigation, and inspection and evaluation efforts.

Public office carries with it a responsibility to apply and account for the use of public resources economically, efficiently, and effectively.³ The OIGs have a special need for high standards of professionalism and integrity in light of the mission of the Inspectors

Executive Order 12805, dated May 11, 1992, updated the charter for the President's Council on Integrity and Efficiency and created the Executive Council on Integrity and Efficiency.

Executive Order 12805, Section 3(c), states that individual members of the Councils should, to the extent permitted under law, adhere to professional standards developed by the Councils. This section gives the Councils the authority to establish standards for quality.

The Standards for Internal Control in the Federal Government, published by the U.S. General Accounting Office (GAO) in November 1999, require that "Management and employees should establish and maintain an environment throughout the organization that sets a positive and supportive attitude toward internal control and conscientious management." The Internal Control Standards define internal control as an integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved: (1) effectiveness and efficiency of operations, (2) reliability of financial reporting, and (3) compliance with applicable laws and regulations.

General under the Act.⁴ Because of this special need, the PCIE and ECIE have adopted the general quality standards contained in this document.

B. OIG Mission

OIGs have responsibility to report on current performance and accountability and to foster good program management to ensure effective government operations. The Inspector General Act of 1978 (IG Act), as amended, created the OIGs to:⁵

- 1. Conduct, supervise, and coordinate audits and investigations relating to the programs and operations of their agencies;
- Review existing and proposed legislation and regulations to make recommendations concerning the impact of such legislation and regulations on economy and efficiency or the prevention and detection of fraud and abuse;
- Provide leadership for activities designed to promote economy, efficiency, and effectiveness, and to promote efforts to reduce fraud, waste, and abuse in the programs and operations of their agencies;
- 4. Coordinate relationships between the agency and other Federal agencies, State and local government agencies, and non-government agencies to promote economy and efficiency, to prevent and detect fraud and abuse, or to identify and prosecute participants engaged in fraud or abuse;
- 5. Inform their agency heads and Congress of problems in their agencies' programs and operations and the necessity for and progress of corrective actions; and

The IG Act (Public Law 95-452), Section 2, established independent and objective units to review agency activities.

⁵ IG Act, Sections 2 and 4.

6. Report to the Attorney General whenever the Inspector General has reasonable grounds to believe there has been a violation of Federal criminal law.

In addition to audits and investigations referenced in item 1 above, OIGs may conduct, supervise, and coordinate inspections, evaluations, and other reviews related to the programs and operations of their agencies.

C. Relationship to Federal Legislation and Regulations, and Federal and Professional Standards

OIG operations are subject to a variety of Federal legislation and regulations, and Federal and other professional standards, such as the IG Act, Single Audit Act, Standards of Ethical Conduct for Employees of the Executive Branch, the Government Auditing Standards, the PCIE Quality Standards for Inspections, and the PCIE/ECIE Quality Standards for Investigations. The standards contained in this document are derived from these and other requirements. However, these standards are not intended to contradict or supersede applicable standards or Federal laws and regulations. See Appendix I for a list of major laws, regulations, and standards that apply to OIGs.

An OIG may be a component of an entity that is not legally defined as a "Federal agency." For this reason, or other reasons, certain laws, regulations, or other guidance cited in this document may not be directly applicable to certain OIGs. Where a standard contained in this document is premised on law or other criteria that are not directly applicable to an OIG, OIGs are encouraged to adopt the underlying principles and concepts to their operations where appropriate and feasible.

II. Ethics, Independence, and Confidentiality

A. General Standard⁶

The Inspector General and OIG staff shall adhere to the highest ethical principles by conducting their work with integrity.⁷

Integrity is the cornerstone of all ethical conduct, ensuring adherence to accepted codes of ethics and practice. Objectivity, independence, professional judgment, and confidentiality are all elements of integrity.

Objectivity imposes the obligation to be impartial, intellectually honest, and free of conflicts of interest.

Independence is a critical element of objectivity. Without independence, both in fact and in appearance, objectivity is impaired.

Professional judgment requires working with competence and diligence. Competence is a combination of education and experience and involves a commitment to learning and professional improvement. Professional standards for audits, investigations, and inspections and evaluations require continuing professional education (see the Managing Human Capital standard). Diligence requires that services be rendered promptly, carefully, and thoroughly and by observing the applicable professional and ethical standards.

Confidentiality requires respecting the value and ownership of privileged, confidential, or classified information received and protecting that information, and safeguarding the identity of

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This standard was adapted from the Standards for Ethical Conduct for Employees of the Executive Branch and the American Institute of Certified Public Accountants' Code of Professional Conduct, Section ET 53-56, and the Institute of Internal Auditors' Code of Ethics.

¹ IG Act, Section 2, established independent units to review agency activities. Section 6(a)(2) gives the Inspector General responsibility for independently determining the nature and extent of the work necessary.

confidential informants. In some instances, legal or professional obligations may require an OIG to disclose information it has received.

B. Standards for Ethical Conduct for Employees of the Executive Branch

The Inspector General and OIG staff shall follow the *Standards for Ethical Conduct for Employees of the Executive Branch*⁸ (Ethical Standards) and the Federal conflict of interest laws. These standards require the Inspector General and the OIG staff to respect and adhere to the 14 principles of ethical conduct, as well as the implementing standards contained in the Ethical Standards and in supplemental agency regulations. The first principle emphasizes that public service is a public trust, requiring employees to place loyalty to the Constitution, laws, and ethical principles above private gain.

Executive Order 12993 ("Administrative Allegations Against Inspectors General")¹¹ provides an independent investigative mechanism to ensure that administrative allegations against IGs and OIG senior staff are expeditiously investigated and resolved. The order establishes a PCIE/ECIE Integrity Committee to receive, review, and refer such allegations. OIGs should maintain policies and controls to ensure that allegations are handled consistent with the executive order. OIGs should also have in place policies and procedures to ensure that criminal allegations against the IG or senior OIG staff are appropriately referred to the Attorney General.

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Oddfied in 5 C.F.R. Part 2635 (January 1, 2002 Edition), as amended at 67 FR 61761-61762 (October 2, 2002)

⁹ 18 U.S.C. Sections 202-209.

¹⁰ 5 C.F.R. Section 2635.101(a). The 14 general principles restate the principles of ethical conduct set forth in Executive Order 12674, as modified by Executive Order 12731

Executive Order 12993, Section 2, dated March 22, 1996, gives the PCIE and ECIE Integrity Committee the responsibility for receiving, reviewing, and referring for investigation allegations of wrongdoing against Inspectors General and certain OIG staff members.

Where a situation is not covered by a specific standard set forth in the Ethical Standards or in supplemental agency regulations, the Inspector General and OIG staff shall apply the principles underlying the standards in determining whether their planned or actual conduct is proper. OIG staff should also consult with the Designated Agency Ethics Official or similar official within their agency or organization regarding application of the Ethical Standards.

C. Independence

The Inspector General and OIG staff must be free both in fact and appearance from personal, external, and organizational impairments to independence. The Inspector General and OIG staff have a responsibility to maintain independence, so that opinions, conclusions, judgments, and recommendations will be impartial and will be viewed as impartial by knowledgeable third parties. The Inspector General and OIG staff should avoid situations that could lead reasonable third parties with knowledge of the relevant facts and circumstances to conclude that the OIG is not able to maintain independence in conducting its work.

1. Statutory Independence

The IG Act of 1978, as amended, established OIGs to create organizationally independent and objective units. This statutory independence is intended to ensure the integrity and objectivity of OIG activities. The IG Act of 1978, as amended, authorizes Inspectors General to:

 Conduct such audits and investigations, and issue such reports, as they believe appropriate (with limited national security and law enforcement exceptions).

¹² 5 C.F.R. Section 2635.101(b).

¹³ IG Act, Section 6(a)(4).

- b. Issue subpoenas for information and documents outside the agency (with the same limited exceptions).¹⁴
- c. Have direct access to all records and information of the agency. 15
- d. Have ready access to the agency head. 16
- e. Administer oaths for taking testimony. 17
- f. Hire and control their own staff and contract resources. 18
- g. Request assistance from any Federal, state, or local governmental agency or unit. 19

Inspectors General report both to the head of their respective agencies and to the Congress.²⁰ This dual reporting responsibility is the framework within which Inspectors General perform their functions. Unique in government, dual reporting is the legislative safety net that protects the Inspector General's independence and objectivity.

2. Personal Impairments

Personal impairments of staff members result from relationships and beliefs that might cause OIG staff members to limit the extent of an inquiry, limit disclosure, or weaken or slant their work in any way. OIG staff are responsible for notifying the appropriate officials within their organization if they have any personal impairments to independence.

¹⁴ IG Act, Section 6(a)(4).

¹⁵ IG Act, Section 6(a)(1).

¹⁶ IG Act, Section 6(a)(6).

¹⁷ IG Act, Section 6(a)(5).

¹⁸ IG Act, Section 6(a)(7), (8), and (9).

¹⁹ IG Act, Section 6(a)(3).

²⁰ IG Act, Sections 2(3), 4(a)(5), and 5(b).

3. External Impairments

Factors external to the OIG may restrict the work or interfere with an OIG's ability to form independent and objective opinions and conclusions. External impairments to independence occur when the OIG staff is deterred from acting objectively and exercising professional skepticism by pressures, actual or perceived, from management and employees of the reviewed entity or oversight organizations. OIGs should have policies and procedures in place to resolve or report external impairments to independence when they exist.

These impairments could include, but are not limited to, the following:²¹

- external interference or influence that could improperly or imprudently limit or modify the scope of OIG work or threaten to do so, including pressure to reduce inappropriately the extent of work performed in order to reduce costs or fees;
- external interference with the selection or application of OIG procedures, the selection of transactions to be examined, or access to records or personnel;
- c. unreasonable restrictions on the time allowed to complete OIG work or reports;
- d. interference external to the OIG in the assignment, appointment, promotion, or termination of OIG personnel;
- e. restrictions on funds or other resources provided to the OIG organization that adversely affect the OIG's ability to carry out its responsibilities;
- f. authority to overrule or to inappropriately influence OIG judgment as to the appropriate content of reports;

²¹ Government Auditing Standards, Section 3.19.

- g. threat of replacement over a disagreement with the contents of an OIG report, conclusions, or the application of an accounting principle or other criteria;
- h. influences that jeopardize the continued employment of the IG or other OIG staff other than incompetence, misconduct, or the need for OIG services.

4. Types of Services

Auditors and audit organizations within OIGs have a specific independence standard²² required by *Government Auditing Standards*. This standard requires that, while auditors have the capability of performing a range of services for their clients, in some circumstances it is not appropriate for them to perform both audit and certain nonaudit services for the same client. The standard is based on two overarching principles:

- a. Auditors should not perform management functions or make management decisions; and
- Auditors should not audit their own work or provide nonaudit services in situations where the amounts or services involved are significant/material to the subject matter of the audit.

In addition to its application to OIG audit activities, the first overarching principle should be applied broadly to all OIG activities. Specifically, OIG staff, and others under OIG direction, should not perform management functions or make management decisions for their agency.

OIG audit organizations should take steps to ensure that auditors under contract to the OIG do not have independence impairments.

²² Government Auditing Standards, Section 3.11-Section 3.25.

5. Conflicting Financial Interests

An OIG staff member's objectivity and independence may also be affected by personal financial interests that are held by the staff member or by certain family members, or by positions the staff member holds as a trustee, director, officer, or employee of an outside organization. OIG staff should notify appropriate officials within their organization if they have a potentially conflicting financial interest.

D. Confidentiality

Each OIG shall safeguard the identity of confidential sources and protect privileged, confidential, and national security or classified information in compliance with applicable laws, regulations, and professional standards.

Congress has provided specific authority for withholding the identities of agency employees who make complaints to the OIG. Under Section 7 of the IG Act of 1978, as amended, the OIG may receive and investigate complaints or information from employees concerning the possible existence of an activity constituting a violation of law, rules, or regulations; mismanagement; waste of funds; abuse of authority; or a substantial and specific danger to the public health or safety. The Inspector General shall not, after receipt of such complaint or information, disclose the identity of the agency employee without the consent of the employee, unless the Inspector General determines that such disclosure is unavoidable.

The Freedom of Information Act, the Privacy Act, the Civil Service Reform Act, the Health Insurance Portability and Accountability Act, ²³ the Trade Secrets Act, ²⁴ and other Federal statutes and case law provide certain protections for the identities of sources and for

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²³ 42 U.S.C. Section 1320d-2 and implementing regulations cover the privacy of individually identifiable health information.

²⁴ 18 U.S.C. Section 1905 prohibits OIGs from disclosing confidential proprietary data obtained during the course of conducting their work unless such disclosure is authorized by law.

sensitive information obtained. Additionally, the relevant professional standards provide guidance on the use, protection, and reporting of privileged and confidential information. OIGs must follow the guidance contained in these authorities.

III. Professional Standards

A. General Standard

Each OIG shall conduct, supervise, and coordinate its audits, investigations, inspections, and evaluations in compliance with the applicable professional standards listed below.

For audits:

Government Auditing Standards, issued by the U.S. General Accounting Office (GAO).

For investigations:

Quality Standards for Investigations, accepted by the PCIE and ECIE and consistent with appropriate Department of Justice directives.

For inspections and evaluations:

Quality Standards for Inspections, accepted by the PCIE and ECIE, Government Auditing Standards, or other appropriate professional standards.

IV. Ensuring Internal Control

A. General Standard

The Inspector General and OIG staff shall direct and control OIG operations consistent with the *Standards for Internal Control in the Federal Government*²⁵ issued by the GAO. These standards require that internal control be part of an entity's management infrastructure to provide reasonable assurance that (1) operations are efficient and effective; (2) financial reporting is reliable; and (3) operations are in compliance with applicable laws, regulations, and professional standards.

Internal control is a continuous built-in component of operations, effected by people, that provides reasonable but not absolute assurance, that the OIG's objectives will be met. Internal control considerations include the following:

B. Efficient and Effective Operations

OIGs should strive to conduct their operation in the most efficient and effective manner. Each OIG should manage available resources at the least cost to produce the greatest results in terms of public benefit, return on investment, and risk reduction. OIGs derive much of their credibility to perform their work by demonstrating the ability to efficiently and effectively use and account for public funds.

C. Control Environment

OIG management and staff should establish and maintain an environment throughout the organization that fosters a positive and supportive attitude toward internal control and conscientious

²⁵ The Federal Managers' Financial Integrity Act of 1982 requires GAO to issue standards for internal control in government. The Office of Management and Budget issues implementing guidelines and specific requirements.

management. Key factors affecting the control environment include the following:

- Integrity and ethical values maintained and demonstrated by OIG management and staff, the organizational structure and delegations of authority and responsibility, and OIG management's philosophy and operating style.
- OIG management's commitment to competence and human capital policies and practices (see the Managing Human Capital standard).
- 3. OIG management's relationship with the Congress, their agency, and the Office of Management and Budget (OMB).

D. Risk Assessment

The Inspector General should provide for an assessment of the risks the OIG faces from both external and internal sources. Risk assessment includes identifying and analyzing relevant risks associated with achieving the OIG's objectives, such as those defined in strategic and annual performance plans, and forming a basis for determining how risks should be managed. Risk assessment methodologies and the formality of their documentation may vary from OIG to OIG, depending on the OIG's size, mission, and other factors.

E. Control Activities

The Inspector General should establish and implement internal control activities that ensure the OIG's directives are carried out. The control activities should be effective and efficient in accomplishing the OIG's control objectives.

Control activities are the policies, procedures, techniques, and mechanisms that enforce management's directives. Control activities are an integral part of the planning, implementing, reviewing, and accountability activities. Control activities include supervisory reviews at all levels to ensure compliance with

applicable professional standards, controls over information processing, physical control over vulnerable assets, establishing and reviewing performance measures and indicators, and segregation of duties.

F. Information and Communication

The Inspector General should ensure that information is recorded and communicated to internal OIG management and others within the OIG who need it and in a form and within a time frame that enables them to carry out their internal quality control and other responsibilities.

For the OIG to control its operations, it must have relevant, reliable, and timely communications relating to internal and external events. Information is needed throughout the OIG to achieve all of its objectives.

G. Monitoring

The Inspector General should ensure that monitoring assesses the quality of performance over time and ensures that the findings and recommendations of quality assurance and other reviews are promptly resolved.

The monitoring standard discusses three different types of activities: ongoing monitoring, self-assessment evaluations, and quality assurance reviews. Ongoing monitoring occurs in the course of normal operations and is continuous. Self-assessment evaluations and independent external reviews can be useful in focusing directly on the controls' effectiveness at a specific time.²⁶ The scope and

The Standards for Internal Control in the Federal Government state that:
"Separate evaluations of control can also be useful by focusing directly on the controls' effectiveness at a specific time. The scope and frequency of separate evaluations should depend primarily on the assessment of risks and the effectiveness of ongoing monitoring procedures. Separate evaluations may take the form of self-assessments as well as review of control design and direct testing of internal control."

frequency of these independent reviews should depend primarily on the assessment of risks and the effectiveness of ongoing control monitoring procedures.

- Ongoing monitoring occurs in the course of normal operations. It is performed continually and is ingrained in the agency operations. It includes regular management and supervisory activities,²⁷ comparisons, reconciliations, and other actions employees take in performing their duties. Ongoing monitoring should include policies and procedures for ensuring that the findings of separate quality control evaluations and quality assurance reviews are promptly resolved.
- Self-assessment evaluations, conducted by the unit or activity itself, include a reassessment of the risks associated with a particular activity and can include periodic reviews of control design and direct testing of internal controls, depending on the risk associated with the activity.
- 3. Independent external reviews are conducted by sources not assigned to the unit being reviewed. These reviews are distinct from ongoing management and supervision, and encompass the entirety of internal control, including administrative operations and professional services (audits, investigations, inspections, and evaluations). Quality assurance is intended to assess the internal controls of the entire OIG or specific OIG components. The Quality Assurance Program is a type of independent review that focuses on complying with professional standards in conducting professional services (see the Maintaining Quality Assurance standard).

The Government Auditing Standards, the Quality Standards for Investigations, and the Quality Standards for Inspections all require that work be adequately supervised through higher level review and approval.

V. Maintaining Quality Assurance

A. General Standard²⁸

Each OIG shall establish and maintain a quality assurance program to ensure that work performed adheres to established OIG policies and procedures; meets established standards of performance, including applicable professional standards; and is carried out economically, efficiently, and effectively.

External quality assurance reviews provide OIGs with added assurance regarding their adherence to prescribed standards, regulations, and legislation through a formal objective assessment of OIG operations. OIGs are strongly encouraged to have external quality assurance reviews of audits, investigations, inspections, evaluations, and other OIG activities. Each OIG shall participate in the external quality assurance review programs required by the PCIE and ECIE.

B. Quality Assurance Program

Because OIGs evaluate how well agency programs and operations are functioning, they have a special responsibility to ensure that their own operations are as effective as possible. The nature and extent of an OIG's quality assurance program depends on a number of factors, such as the OIG size, the degree of operating autonomy allowed its personnel and its offices, the nature of its work, its organizational structure, and appropriate cost-benefit considerations. Thus, the program established by individual OIGs could vary, as could the extent of their documentation. However, each organization should prepare appropriate documentation to demonstrate compliance with its policies and procedures for its system of quality assurance.

This standard is based on the Standards for Internal Control in the Federal Government and the quality control and assurance standard in the Government Auditing Standards (Section 3.49).

- 1. The quality assurance program is an evaluative effort conducted by reviewers external to the units/personnel being reviewed to ensure that the overall work of the OIG meets appropriate standards. The quality assurance program has an internal and external component.
- 2. The internal quality assurance program can include reviews of all aspects of the OIG's operations. The reviews are conducted by internal OIG staff that are external to the units being reviewed. The internal quality assurance program is distinct from regular management and supervisory activities, comparisons, and other activities by OIG staff performing their duties. Thus, an audit supervisor ensuring that audit reports are properly referenced to working papers is an example of regular supervision whereas an independent reviewer evaluating the referencing process is an example of internal quality assurance.
- External quality assurance reviews are conducted by independent organizations not affiliated with the OIG being reviewed.

C. Elements of an Internal Quality Assurance Program

- 1. An internal quality assurance program must be structured and implemented to ensure an objective, timely, and comprehensive appraisal of operations. The internal quality assurance reviews should be conducted by individuals who are not directly involved in the activity or unit being reviewed and who do not report to the immediate supervisor of that activity or unit.
- The same professional care should be taken with quality assurance reviews as with other OIG efforts, including adequately planning the review, documenting findings, developing supportable recommendations, and soliciting comments from the supervisor of the activity or unit reviewed.

3. The Inspector General shall implement necessary improvements on a timely basis.

D. Elements of an External Quality Assurance Program

- The purpose of the external quality assurance program is to provide an additional and external level of assurance that the OIG conducts its audits, investigations, inspections, and evaluations in compliance with applicable professional standards.
- The objective of the external quality assurance review is to determine whether the internal control system is in place and operating effectively to provide reasonable assurance that established policies and procedures and applicable professional standards are being followed.
- 3. Organizations and individuals managing and conducting external quality assurance reviews should be highly qualified and comply with specific supplemental guidance issued by the PCIE and ECIE to ensure the highest level of review quality. Individuals conducting these reviews should have a thorough knowledge of the applicable professional standards and the environment relative to the work being performed.
- 4. The reviewers should be independent of the organization being reviewed, its staff, and the work selected for review.
- The reviewers should have knowledge related to performing an external quality assurance review and use professional judgment in conducting and reporting on the results of the review.
- 6. The review should be sufficiently comprehensive to assess whether the internal quality assurance program meets its objectives.
- 7. The external reviewers and the organization under review should prepare and sign a memorandum of understanding regarding fundamental aspects of the review. Possible topics include scope; staffing and time frames; discussion of

- preliminary findings; reporting; handling of requests for reports, letters of comment, and review documentation; and procedures to address disagreements on findings and recommendations.
- 8. OIGs should provide copies of final reports resulting from external quality assurance reviews to the head of the agency or department and to the Chair and the Vice Chairs of the PCIE or ECIE, as appropriate. Upon request and subject to applicable law, the reports and letters of comment should be made available to the public in a timely manner.
- OIGs should have procedures in place to address findings and recommendations contained in external quality assurance reviews.
- 10. The external quality assurance program can be extended to cover other OIG operations.

VI. Planning and Coordinating

A. General Standard

Each OIG shall maintain a planning system assessing the nature, scope, and inherent risks of agency programs and operations. This assessment forms the basis for establishing strategic and performance plans, ²⁹ including goals, objectives, and performance measures to be accomplished by the OIG within a specific time period. ³⁰

The Inspector General and OIG staff shall coordinate their activities internally and with other components of Government to assure effective and efficient use of available resources.³¹

The Government Performance and Results Act of 1993, Section 3(a), requires each agency to develop a 5-year strategic plan, and, in Section 4(a) and (b), to prepare annual performance plans and reports. A January 28, 1998 memorandum from OMB to the PCIE and the National Science Foundation OIG requires each OIG that has a separate line item account in the President's Budget Appendix to submit a performance plan. The OIGs can either include goals, objectives, and measures in their agency's strategic and performance plans or develop their own strategic and annual performance plans and performance reports.

OMB Circular No. A-123, *Management Accountability and Control*, Section 2, states that management accountability is the expectation that managers are responsible for the quality and timeliness of program performance, increasing productivity, controlling costs and mitigating adverse aspects of agency operations, and ensuring that programs are managed with integrity and in compliance with applicable law.

Throughout the IG Act, the IGs are given responsibility for coordinating their activities. In Section 4(a)(1), (3), and (4), the IGs are to coordinate the following: Section 4(a)(1) audits and investigations relating to the programs and operations of the agency; Section 4(a)(3) other activities carried out or financed by the agency for the purpose of promoting economy and efficiency or preventing and detecting fraud and abuse in its programs and operations; Section 4(a)(4) relationships between the agency and other Federal agencies, State and local governments, and nongovernmental entities with respect to (A) all matters relating to promoting economy and efficiency or preventing and detecting fraud and abuse in programs and operations administered or financed by the agency or (B) identifying and prosecuting participants in such fraud or abuse.

B. Elements of the Planning Process

OIGs should develop an appropriate planning process, giving consideration to the following elements.

- 1. Use a strategic planning process that carefully considers current and emerging agency programs, operations, risks, and management challenges. This analysis will identify the nature of agency programs and operations, their performance measures and anticipated outcomes, their scope and dollar magnitude, their staffing and budgetary trends, their perceived vulnerabilities, and their inherent risks.
- 2. Develop a methodology and process for identifying and prioritizing agency programs and operations as potential subjects for audit, investigation, inspection, or evaluation. The methodology should be designed to use the most effective combination of OIG resources, including previous OIG work and input from OIG staff. Also, the OIG should consider the plans of other organizations both internal and external to the agency.
- 3. Use an annual performance planning process that identifies the activities to audit, investigate, inspect, or evaluate and translates these priorities into outcome-related goals, objectives, and performance measures. As part of this planning process, OIGs should consider agency actions to address recommendations from prior OIG work. Because resources are rarely sufficient to meet requirements, the OIG must choose among competing needs.

C. Coordination Considerations

1. In planning work, the OIG should coordinate, where applicable, with agency management to ensure that OIG priorities appropriately consider agency needs. The OIG should take into consideration requests from the Congress, the OMB, other external stakeholders, the PCIE, the ECIE, complaints from employees and, as appropriate, private

- citizens. By using this information, along with the OIG's knowledge of agency objectives and operations, the OIG can plan its work based on the relative costs and benefits.
- 2. The OIG should minimize duplicative work. The OIG should coordinate its work internally and with other groups (both inside and outside the agency) performing independent evaluations of agency operations and programs. This coordination should identify the nature and scope of other reviews, both planned and completed, to avoid duplicating others' work. Coordinating with the GAO is particularly important. As part of the planning process, each OIG should coordinate as needed with GAO representatives to exchange and discuss tentative plans for the next fiscal year.³² If duplication is identified, every effort should be made to resolve it.
- The OIG will closely coordinate, if applicable, with the Department of Justice with respect to criminal and civil investigations in compliance with investigative standards and applicable deputations and accompanying memoranda of understanding.
- 4. When OIG staff identify problems that might affect other offices, agencies, or arms of government, the OIG should coordinate with them and their respective OIGs. Where appropriate, joint or coordinated audits, investigations, inspections, or evaluations may be performed to fulfill all the interested parties' requirements.³³

³² IG Act, Section 4(c).

According to Executive Order 12805, Section 3(a), the PCIE and ECIE shall continually identify, review, and discuss areas of weakness and vulnerability in Federal programs and operations to fraud, waste, and abuse, and shall develop plans for coordinated, Government-wide activities that address these problems and promote economy and efficiency in Federal programs and operations. These activities will include interagency and inter-entity audit and investigation programs and projects to deal efficiently and effectively with those problems concerning fraud and waste that exceed the capability or jurisdiction of an individual agency or entity. The Councils shall recognize the preeminent role of the Department of Justice in law enforcement and litigation.

5. Because of the close interrelationships among many Federal programs, situations will arise where audit, investigation, inspection, or evaluation activity by one OIG will require work with another agency's program or administrative staff. In such cases, the OIGs will coordinate in order to facilitate the efficient accomplishment of the work.

D. Prevention

OIG planning should develop a strategy to identify the causes of fraud, waste, abuse, and mismanagement in high-risk agency programs, and to help agencies implement a system of management improvements to overcome these problems.³⁴ OIG prevention efforts may include the following:

- A routine procedure for OIG staff to identify and report prevention opportunities as these may come up in their work, and for OIG managers to refer these to agency management, as appropriate;
- 2. Special awareness and training initiatives designed to alert agency employees to systemic weaknesses in the programs and operations of their agencies;
- 3. Review and comment on initial design of new agency programs and operations;
- 4. Analyses of audit, investigative, and other OIG reports to identify trends and patterns;
- 5. Education and training to ensure that appropriate OIG staff have requisite abilities in the loss prevention area, as well as fraud detection and prevention; and

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The IG Act of 1978, as amended, Section 2(2)(B), requires OIGs "to provide leadership and coordination and recommend policies for activities designed...to prevent and detect fraud and abuse...." Section 4(a)(3) reiterates the OIG's mission "to recommend policies for, and to conduct, supervise, or coordinate other activities...for the purpose of...preventing and detecting fraud and abuse."

6. An effective means for tracking the implementation of recommendations.

VII. Communicating Results of OIG Activities

A. General Standard

Each OIG shall keep agency management, program managers, and the Congress fully and currently informed of appropriate aspects of OIG operations and findings. OIGs should assess and report to the Congress, as appropriate, on their own strategic and annual performance and the performance of the agency or department for which they have cognizance. Each OIG shall also report expeditiously to the Attorney General whenever the Inspector General has reasonable grounds to believe there has been a violation of criminal law.

B. Keeping the Head of the Agency Informed³⁵

- 1. Through periodic briefings and reports, the Inspector General should keep the appropriate department and agency heads advised of important undertakings of the OIG, its outcomes, and any problems encountered that warrant the department or agency head's attention.
- The Inspector General should timely advise department and agency heads, consistent with requirements of confidentiality, of any agency official who attempts to impede or fails to require a contractor under his or her responsibility to desist from impeding an audit, investigation, inspection, evaluation, or any other OIG activity.
- 3. The Inspector General should timely alert department and agency heads, consistent with requirements imposed by

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³⁵ IG Act, Section 2(3), requires that OIGs keep the head of the establishment and the Congress fully and currently informed about problems and deficiencies relating to the administration of programs and operations and the necessity for and progress of corrective action. Section 4(a)(5) and Section 5(b) require semiannual reports.

³⁶ IG Act, Section 6(b)(2).

confidentiality and the prosecutive system, to examples of egregious misconduct and waste.

C. Keeping the Congress Informed³⁷

- 1. The Inspector General shall report to the Congress, as required by the IG Act of 1978, as amended, and other legislation, regulations, and directives.
- 2. The Inspector General may also inform the agency head and Congress through the seven day letter (IG Act of 1978, as amended, Section 5(d)), or other appropriate means of particularly serious programmatic or administrative problems that contribute to fraud, waste, abuse, or mismanagement in agency operations and programs.
- 3. If the results of an audit, investigation, inspection, or evaluation indicate that deficiencies in Federal law contribute to fraud, waste, or abuse, these matters may be brought to the attention of the Congress, and may include recommendations for statutory change.³⁸
- 4. The Inspector General shall also report to the Congress and OMB on management challenges facing the agency or department and progress in meeting the challenges.³⁹

³⁷ See footnote 35.

³⁸ IG Act, Section 4(a)(2).

³⁹ 31 U.S.C., Section 3516(d), requires OIGs to summarize what the IG considers to be the most serious management and performance challenges facing the IG's agency and briefly assess the agency's progress in addressing those challenges. This requirement is triggered by the agency's consolidation of reports made to the Congress, OMB, or the President.

D. Keeping the Congress and Agency Informed on Performance⁴⁰

- Each OIG should annually assess its own performance by evaluating actual to planned performance.
- 2. Each OIG should have sufficient information to conduct performance evaluations, e.g., a history of past results to show prior performance, a strategic and annual planning process to show expected performance, and a management information system to show actual performance.
- 3. Each OIG should report annually on its actual performance as compared to its performance goals, either as a contributing part of their agency reporting under the Government Performance and Results Act of 1993 (GPRA), if appropriate, or independently to their Agency and Congress.
- 4. Inspectors General may also advise the Congress on the performance goals, measurement process, and results of the agencies and departments for which they have cognizance.

E. Keeping Program Managers Informed

The OIG should make a special and continuing effort to keep program managers and their key staff informed, if appropriate, about the purpose, nature, and content of OIG activity associated with the manager's programs. These efforts may include periodic briefings as well as interim reports and correspondence.

F. Keeping Ethics Officials Informed

The OIG should make a special and continuing effort to keep the Designated Agency Ethics Official or similar official informed about OIG activities, including the results of investigations and allegations

⁴⁰ See footnote 29.

of ethical misconduct where appropriate, that related to the ethics official's responsibilities for the agency's ethics program.

G. Keeping the Attorney General Informed⁴¹

The OIG shall notify the Department of Justice and seek a prosecutive opinion whenever the OIG develops evidence of a Federal crime.

H. Elements of Effective Reporting⁴²

- 1. All products issued should comply with applicable professional standards and conform to the OIG's established policies and procedures.
- 2. Whether written or oral, all OIG reports should be objective, timely, and useful.
- 3. All products should be adequately supported.

⁴¹ IG Act, Section 4(d).

OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies require agencies to adopt a basic standard of information quality (including objectivity, utility, and integrity) as a performance goal and take appropriate steps to incorporate information quality criteria into agency information dissemination practices. Quality is to be ensured and established at levels appropriate to the nature and timeliness of the information to be disseminated. Agencies shall adopt specific standards of quality that are appropriate for the various categories of information they disseminate, and, as a matter of good and effective agency information resources management, agencies are to develop a process for reviewing the quality (including the objectivity, utility, and integrity) of information before it is disseminated. The Government Auditing Standards, the Quality Standards for Investigations, and the Quality Standards for Inspections all address reporting standards for individual audit, investigative, and inspection or evaluation reports.

VIII. Managing Human Capital

A. General Standard⁴³

Each OIG should have a process to ensure that the OIG's staff members collectively possess the core competencies needed to accomplish the OIG mission.

B. Human Capital Processes

Each OIG's process for ensuring that its staff members possess the requisite qualifications should encompass processes for recruiting, hiring, continuously developing, training, and evaluating their staff members, and succession planning to assist the organization in maintaining a workforce that has the ability to meet the OIG's mission.

C. Core Competencies

Staff members must collectively possess the professional competence (i.e., teamwork, leadership, communication, technical knowledge, critical thinking skills, abilities, and experience) to perform the work assigned. In addition, staff must individually meet requirements established by the Office of Personnel Management for their respective job series and by applicable professional standards.

The Standards for Internal Control in the Federal Government identifies one factor affecting the control environment as management's commitment to competence. All personnel need to possess and maintain a level of competence that allows them to accomplish their assigned duties, as well as understand the importance of developing and implementing good internal control. Management needs to identify what appropriate knowledge and skills are needed for various jobs and provide training as well as candid and constructive counseling, and performance appraisals. The Standards also discuss good human capital policies and practices as another critical environmental factor. This includes establishing appropriate practices for hiring, orienting, training, evaluating, counseling, promoting, compensating, and disciplining personnel. Executive Order 12805, Section 3(b), states that the PCIE and ECIE shall develop policies that will aid in the establishment of a corps of welltrained and highly skilled Office of Inspector General staff members.

D. Skills Assessment

To ensure that the OIG staff members collectively possess needed skills, the Inspector General and key managers should assess the skills of their staff members and determine the extent to which these skills match the OIG's requirements. OIG management is responsible for deciding the methods by which identified needs can be met by hiring contractors or outside consultants, using staff members who possess the requisite skills, developing staff members and providing training, or recruiting new staff. Each OIG must also ensure that staff members meet the requirements for continuing professional education contained in the applicable professional standards.⁴⁴

⁴⁴ The *Government Auditing Standards*, the *Quality Standards for Investigations*, and the *Quality Standards for Inspections* each require that the personnel collectively possess the skills and abilities to perform the assigned tasks and require continuing professional education.

IX. Reviewing Legislation and Regulations

A. General Standard

Each OIG shall establish and maintain a system to review and comment on existing and proposed legislation, regulations, and those directives that affect either the programs and operations of the OIG's agency or the mission and functions of the OIG.⁴⁵ The system should result in OIG recommendations designed to (1) promote economy and efficiency in administering agency programs and operations; (2) prevent and detect fraud and abuse in such programs and operations; and (3) protect the integrity and independence of the OIG.

B. Elements of Legislative and Regulatory Review

- 1. OIGs should assure independent and timely formulation and, to the extent within their control, transmission of OIG recommendations so that authorities dealing with the matters concerned can adequately consider the OIG comments. This requires early identification of legislative, regulatory, and those key administrative or directive issues of particular interest to the OIG.
- OIGs should seek implementation of agency procedures that routinely provide for OIG review or comment on legislative and regulatory proposals of interest to the OIG and on agency-wide directives.
- OIGs should have written procedures for and conduct appropriate reviews, as necessary, of authorizing legislation, regulations, and directives during investigations, internal audits, inspections and evaluations, and other OIG activities,

⁴⁵ The IG Act, Section 4(a)(2), gives IGs the responsibility to review existing and proposed legislation and regulations and make recommendations in the semiannual reports on the impact of legislation or regulations on the economy and efficiency of administering the agency's programs and operations or in preventing and detecting fraud and abuse.

particularly when it appears that a lack of controls or deficiencies in law have contributed to fraud, waste, abuse, and mismanagement.

X. Receiving and Reviewing Allegations

A. General Standard⁴⁶

Each OIG shall establish and follow policies and procedures for receiving and reviewing allegations. This system should ensure that an appropriate disposition, including appropriate notification, is made for each allegation.

B. Elements of a System for Receiving and Reviewing Allegations

This system should ensure that:

- The OIG has a well-publicized vehicle through which agency employees and other interested persons can submit allegations of fraud, waste, abuse, and mismanagement, preserving anonymity when possible.
- 2. Each allegation is retrievable and its receipt, review, and disposition are documented.
- Each allegation is initially screened to ensure that urgent and/or high priority matters receive timely attention and facilitate early determination of the appropriate courses of action for those complaints requiring follow-up action.
- 4. Based on the nature, content, and credibility of the complaint, allegations are appropriately reviewed.

C. Feedback

The OIG may establish a mechanism for providing feedback to parties who submit allegations. This feedback can be furnished in summary form through such vehicles as an employee newsletter, a semiannual report digest, or other means.

⁴⁶ IG Act, Section 7.

Legislation, Executive Orders, Standards, and OMB and Other Guidance Impacting the Inspector General Community

Document ^a	Description
Legislation	
The Inspector General Act of 1978, as amended, 5 U.S.C. App. 3 (P.L. 95-452).	Establishes independent and objective Offices of Inspector General.
Accounting and Auditing Act of 1950, 31 U.S.C. §§713, 714, 718, 719, 3326, 3501, 3511-3514, 3521, 3523, 3524 (P.L. 97-258).	Requires the head of each executive agency to certify that the agency's systems for internal accounting and administrative control comply with standards prescribed by the Comptroller General.
Budget and Accounting Act of 1921, 31 U.S.C. §§ 501, 502, 521, 522, 701-704, 711, 712, 716, 718, 719, 731, 771-779, 1101, 1104-1108, 1111, 1113, 3301, 3323, 3324, 3521, 3522, 3526, 3529, 3531, 3541, 3702. (42 Stat. 20)	Assigns responsibilities for government accounting, auditing, and financial reporting to improve evaluations of Federal Government programs and activities by better identifying sources of funding and how the funding was applied.
Federal Financial Management Act of 1994, 31 U.S.C. §§ 331, 501 note, 3301 note, 3332, 3515, 3521. (P.L. 103-356)	Requires all agencies covered by the Chief Financial Officers Act to prepare annual, agency-wide financial statements.
Federal Financial Management Improvement Act of 1996, 5 U.S.C. App \$5; 10 U.S.C. §8 113 note, 2315; 15 U.S.C. §278g-3; 28 U.S.C. §612; 31 U.S.C. §§ 3512, 3512 note, 3521; 38 U.S.C. §310; 40 U.S.C. §§ 1401 notes, 1441 note; 41 U.S.C. § 251 notes.(P.L. 104-208)	Provides for the establishment of uniform Federal Government accounting systems, accounting standards, and reporting systems.

Document ^a	Description
Federal Managers Financial Integrity Act of 1982, 31 U.S.C. §§1105, 1113, 3512. (P.L. 97-255)	Provides for establishment, implementation, and evaluation of accounting and administrative controls regarding financial management activities.
Government Performance and Results Act of 1993, 5 U.S.C. § 306; 31 U.S.C. §§ 1101 note, 1105, 1115, 1115 note, 1116-1119, 9703, 9704; 39 U.S.C. §§ 2801-2805. (P.L. 103-62)	Provides for the establishment of strategic planning and performance measurement in the Federal Government.
Government Management Reform Act of 1994, 2 U.S.C. § 31, 31 note; 3 U.S.C. § 104; 5 U.S.C. §§ 5318, 6304, 6304 note; 28 U.S.C. § 461; 31 U.S.C. §§ 331 note, 501 note, 1113 note, 3301 note, 3332, 3515, 3521. (P.L. 103-356)	Improves the efficiency of executive branch performance by enhancing reporting to the Congress through elimination and consolidation of duplicative or obsolete reporting requirements.
Chief Financial Officers Act of 1990, 5 U.S.C. §§ 5313-5315; 31 U.S.C. §§ 501 notes, 502-506, 901, 901 notes, 902, 903, 1105, 3511 note, 3512, 3515, 3515 note, 3521, 3521 note, 9105, 9106; 38 U.S.C. § 201 note; 42 U.S.C. § 3533. (P.L. 101-576)	Improves the general and financial management of the Federal Government.
E-Government Act of 2002, 5 U.S.C. §§ 3111, 3701-3707, 4108, 8432 note; 10 U.S.C. §§ 2224, 2332; 13 U.S.C. § 402; 15 U.S.C. §§ 176a, 278g-3, 278g-4; 18 U.S.C. §§ 207, 209; 28 U.S.C. § 1913 note; 31 U.S.C. §§ 503, 507; 40 U.S.C. §§ 305, 502, 11331, 11332, 11501-11505, 11521, 11522; 41 U.S.C. §§ 266a, 423; 44 U.S.C. §§ 101 note, 3501, 3504-3506, 3531, 3541-3549, 3601-3606. (P.L. 107-347)	Provides for the independent review of Federal agency information technology security by Offices of Inspector General.

Document^a Description Clinger-Cohen Act of 1996, 5 U.S.C. § Provides for OMB oversight of 571 note, 5315; 5 U.S.C. App 3 § 11, 11 information technology note; 10 U.S.C. §§ 1701 note, 2220, development and acquisition, 2249, 2302, 2304, 2304 note, 2304e, agency management of IT investments, and establishment of 2305, 2305a, 2306a, 2306 note, 2306b, 2315, 2323, 2324, 2350b, 2372, 2384, standards by NIST. 2397, 2397a-2397c, 2400, 2401 note, 2405, 2409, 2410, 2410b, 2410d, 2410g, 2424, 2431, 2432 note, 2461, 2533, 2539b, 2662, 2702; 15 U.S.C. §§ 278g-3, 637, 644, 789; 16 U.S.C. § 799; 18 U.S.C. § 281; 22 U.S.C. § 2761, 2761 note; 28 U.S.C. § 612; 29 U.S.C. § 721; 31 U.S.C. §§ 1352, 1558, 3551-3554; 38 U.S.C. § 310; see 40 U.S.C. §§ 11101-11103, 11301-11303, 11311-11318, 11331, 11332, 11501-11505, 11521, 11522, 11701-11704; 41 U.S.C. §§ 10a note, 11, 15, 20a, 20b, 22, 35 note, 43a, 43b, 44, 45, 57, 251 note, 253, 253a, 253b, 253l, 253m, 254b, 254d, 255, 257, 264a, 265, 266, 401-434, 601, 605, 612, 701; 42 U.S.C. §§ 6392, (P.L. 104-156) Reports Consolidation Act of 2000, 31 Encourages and authorizes report consolidation; makes report U.S.C. §§ 3116, 3501 note, 3515, 3516, 3521. (P.L. 106-531) formats more useful and meaningful; improves the quality of information reported; enhances the coordination and efficiency of such reports. Single Audit Act Amendments of 1996, Requires that the Government Auditing Standards be followed in 31 U.S.C. §§ 7501, 7501 notes, 7502-7505. (P.L. 104-156) audits of state and local governments and nonprofit entities that receive federal financial assistance.

Document ^a	Description
Privacy Act, 5 U.S.C. §552 (P.L. 93-579)	Places limitations on how federal agencies collect, use, and disclose information about individuals (U.S. citizens and resident aliens). Gives individuals the right to have access to records maintained on them by agencies and the right to seek corrections to those records, subject to various exemptions.
Freedom of Information Act, as amended, 5 U.S.C. §552, (P.L. 104-231)	Holds the government accountable to the governed; it establishes a statutory right, enforceable in court, for persons (individuals, corporations, etc.) to have access to Federal agency records, subject to certain exemptions.
Whistleblower Protection Act, 5 U.S.C. §§ 1201, 1201 notes, 1202-1206, 1208, 1209, 1211, 1211 note, 1212-1219, 1221, 1222, 2302, 2303, 3352, 3393, 5509 notes, 7502, 7512, 7521, 7542, 7701, 7703; 22 U.S.C. § 4139.	Protects the rights of, and prevents reprisals against, Federal employees who disclose governmental fraud, waste, abuse, and other types of corruption or illegality.
Health Insurance Portability and Accountability Act (PL 104-191)	Covers the privacy of individually-identifiable information.
Trade Secrets Act, 18 U.S.C. § 1905.	Prohibits OIGs from disclosing confidential proprietary data obtained during the course of conducting their work unless such disclosure is authorized by law.
Federal Conflict of Interest Laws, 18 U.S.C. Sections 202-209	Establishes criminal prohibitions for employees of the Executive Branch.

Document ^a	Description
Executive Orders	
Integrity and Efficiency in Federal Programs, Exec. Order No. 12805, 57 FR 20627 (May 11, 1992).	Establishes the PCIE and ECIE and describes their functions and responsibilities.
Administrative Allegations Against Inspectors General, Exec. Order No. 12993, 61 FR 13043 (March 21, 1996).	The PCIE and ECIE Integrity Committee shall receive, review, and refer for investigation allegations of wrongdoing against IGs and certain staff members of OIGs.
Standards	
Standards for Internal Control in the Federal Government, GAO/AIMD-00-21.3.1 (November 1, 1999).	Establishes overall framework for establishing and maintaining internal control and for identifying and addressing major performance and management challenges and areas at greatest risk of fraud, waste, abuse, and mismanagement.
Government Auditing Standards: 2003 Revision, GAO-03-673G (June 2003).	Establishes standards for government audits.
Quality Standards for Investigations, PCIE/ECIE (September 1997).	Establishes standards for investigative efforts conducted by criminal investigators working for Federal Offices of Inspector General.
Quality Standards for Inspections, PCIE (March 1993).	Establishes standards for inspections and evaluations conducted by Federal Offices of Inspector General.
Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. Part 2635 (2003).	Establishes general principles for ethical conduct of employees of the Executive Branch.

Document ^a	Description	
Statements of Federal Financial Accounting Standards, Federal Accounting Standards Advisory Board (May 2002).	Accounting principles for Federal government reporting entities issued by the Federal Accounting Standards Advisory Board.	
Codification of Statements on Auditing Standards (Including Statements on Standards for Attestation Engagements), American Institute of Certified Public Accountants (2003).	Auditing standards for financial audits.	
OMB Circulars, Bulletins, and Guidelines		
Various OMB Circulars, Bulletins, and Guidelines	Establish requirements and guidelines for implementing: internal controls management accountability and control federal financial systems management of federal information resources audits of states, local governments and non-profit organizations financial accounting principles and standards financial statement audits information dissemination	
Other Guidance		
Guide for Conducting External Quality Control Reviews of the Audit Operations of the Offices of Inspector General, PCIE (February 2002).	Provides guidance on conducting external quality control reviews of OIG Offices of Audit.	

Document ^a	Description
Guide for Conducting Qualitative Assessment Reviews for the Investigative Operations of Inspectors General, PCIE/ECIE (2002).	Provides guidance on conducting external qualitative assessment reviews of OIG investigative operations.
GAO/PCIE Financial Audit Manual, GAO-01-765G (July 2001).	Provides guidance on conducting financial statement audits.

^a Some OIGs are not components of an entity legally defined as a "Federal agency." Therefore, some of the cited laws, regulations, or other guidance may not be directly applicable by law to all OIGs. In these cases, principles or concepts of the guidance may be adopted by the OIG entities as a matter of policy.

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