



**INSPECTOR GENERAL**  
**DEPARTMENT OF DEFENSE**  
4800 MARK CENTER DRIVE  
ALEXANDRIA, VIRGINIA 22350-1500

August 30, 2023

MEMORANDUM FOR HONORABLE MARK L. GREENBLATT, INSPECTOR GENERAL,  
DEPARTMENT OF THE INTERIOR

SUBJECT: External Peer Review Report

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. We conducted the peer review from April 7, 2022, through June 26, 2023.

As the reviewing Office of Inspector General (OIG), we assessed the extent to which the Department of the Interior Office of Inspector General Office of Audits, Inspections, and Evaluations (DOI-OIG-AIE) complied with the CIGIE Quality Standards for Inspection and Evaluation (Blue Book). This external peer review included an assessment of the DOI-OIG-AIE's internal policies and procedures implementing the December 2020 Blue Book that became effective January 1, 2022. This external peer review also included a review of selected inspection and evaluation reports issued between April 1, 2019, and March 31, 2022. We assessed reports issued in accordance with the December 2020 Blue Book for compliance with the December 2020 Blue Book and the DOI-OIG-AIE's associated internal policies and procedures. We also assessed reports issued in accordance with the January 2012 Blue Book for compliance with the seven covered Blue Book standards (Quality Control, Planning, Data Collection and Analysis, Evidence, Records Maintenance, Reporting, and Follow-Up) from the January 2012 Blue Book and the DOI-OIG-AIE's associated internal policies and procedures.

### **Overall Conclusion**

The DoD OIG determined that the DOI-OIG-AIE's policies and procedures were generally consistent with the Independence, Competence, Planning, Evidence Collection and Analysis, Reporting, Follow-Up, and Quality Control Blue Book standards. Of the four reports reviewed, the three that the DOI-OIG-AIE issued in accordance with the January 2012 Blue Book generally complied with the seven covered Blue Book standards. The one report that the DOI-OIG-AIE issued in accordance with the December 2020 Blue Book generally complied with the Blue Book standards.

### **Follow-Up on Implementation of Prior Peer Review Recommendations**

We noted these findings during our follow-up on implementation of prior peer review recommendations.

The DOI-OIG-AIE has not completed corrective action for one partially implemented recommendation from its 2019 peer review. The 2019 DOI-OIG-AIE inspection and evaluation peer review report identified the lack of a policy on researching, selecting, and prioritizing audit, inspection, or evaluation projects for inclusion as a finding in the AIE annual work plan. The report recommended that the DOI-OIG-AIE develop a written policy addressing these topics. The AIE Assistant Inspector General agreed with the recommendation. The DOI OIG AIE partially addressed the recommendation by including a section on initiation, acceptance, and continuation of assignments in Inspector General Manual 905. DOI-OIG-AIE officials stated that they also planned to issue a work planning standard operating procedure (SOP) by September 30, 2022. In July 2022, a DOI-OIG-AIE official informed us that the AIE was still developing its annual work planning process, would not issue the SOP in September 2022, and did not have an estimated completion date for the SOP. Until the DOI OIG-AIE issues the SOP, the DOI-OIG-AIE's policies and procedures are not consistent with Requirement 3.1 of the December 2020 Blue Book planning standard. Requirement 3.1 requires inspection organizations to have a basis or rationale for the selection of inspection topics.

In 2021, DOI-OIG-AIE officials developed a multi-step, risk-based approach for the oversight planning process, resulting in the DOI-OIG-AIE FY 2022–2023 Oversight Plan. The oversight plan describes the DOI-OIG-AIE's risk-based, tiered approach that includes three management challenges, potential impacts of other unaddressed challenges, and additional factors such as stakeholder priorities, prior work, and emerging threats or vulnerabilities. A DOI-OIG-AIE official stated that management delayed issuing an SOP due to leadership changes in 2021 and 2022.

Section 5(a)(16) of the Inspector General Act requires the reviewing OIG to include in its Semiannual Report to Congress (SAR) recommendations from previous peer reviews that remain outstanding or have not been fully implemented. We will include information in the DoD OIG SAR on this partially implemented recommendation until the DOI-OIG-AIE issues its work planning SOP.

### **Views of Responsible Official**

The DOI-OIG-AIE stated that they believe the substantial changes made to their annual planning process satisfy this Blue Book requirement and implement the intent of the 2019 recommendation. In 2021, the DOI-OIG-AIE reassessed many processes, which ultimately resulted in an initiative through which the DOI-OIG-AIE significantly modified annual work planning. In 2022, the DOI-OIG-AIE completed the initiative, which incorporated a more risk-based, strategy-driven, and collaborative approach. The DOI-OIG-AIE acknowledged that it has not completed the recommendation in the 2019 peer review to develop a written policy. However, the DOI-OIG-AIE has completed the overall revisions to its work planning process and is fully committed to drafting and issuing the SOP by September 30, 2023.

In August 30, 2023, we issued a Letter of Comment that describes findings that were not considered to significantly impact compliance with a covered Blue Book standard to include in this external peer review report.



Robert P. Storch  
Inspector General

Attachments:  
As stated

## Attachment 1: Scope and Methodology

The DoD OIG review team initially selected for review a non-statistical sample of 4 of 15 reports that the DOI-OIG-AIE issued during the period of April 1, 2021, through March 31, 2022. Specifically, the review team selected the latest report from each category—the only evaluation report issued by the Eastern Region, one of four inspection reports issued by the Central Region, one of five evaluation reports issued by the Western Region, and one of five inspection reports issued by Contracts and Grants. The sample of selected reports included two reports with recommendations, including one report with questioned costs. The review team initially selected the following four reports for review.

- Lack of Tracking and Unclear Guidance Identified in the U.S. Department of the Interior’s Awareness Review Process for Freedom of Information Act Requests, 2019-ER-057, February 25, 2022
- The U.S. Department of the Interior Needs a Strategy to Coordinate Implementation of the Great American Outdoors Act, 2021-CR-031, March 23, 2022
- Office of Navajo and Hopi Indian Relocation Review: Status of the Office of Navajo and Hopi Indian Relocation’s Assets and Official Records, 2020-WR-016-I, March 25, 2022
- Fulfillment of Purchase Card Orders, 2021-FIN-022, January 19, 2022

The DOI OIG could not provide accessible assignment documentation for Eastern Region Report 2019-ER-057 due to an unresolved migration issue during the transfer of the assignment file to the new assignment documentation software. Several options to review the file, such as providing the review team with reports generated from the assignment file or viewing the assignment file documentation on a DOI OIG computer, were not feasible. Therefore, the review team selected a replacement report, Compliance with Executive Order 13950, Combatting Race and Sex Stereotyping, 2021-ER-009, January 7, 2021, which the Eastern Region also issued. The report was an inspection versus evaluation report.

The review team also reviewed the six agreed-to recommendations and associated corrective actions taken from a prior DOI-OIG-AIE peer review report dated September 5, 2019. See the Letter of Comment for information on the status of the prior peer review recommendations as reported by the DOI OIG in its semiannual reports.

The DoD OIG conducted this peer review remotely. We held a virtual entrance conference with the DOI-OIG-AIE management on April 7, 2022, and a virtual exit conference on September 8, 2022. The review team communicated with management officials and assignment teams via email throughout the review. A team member made a site visit to the Eastern Regional Office in Herndon, Virginia, on July 25, 2022, to verify that we could access the assignment file for Report No. 2019-ER-009 on the DOI OIG system.

## Attachment 2: Reviewed Organization's Comments to the Peer Review Report



### OFFICE OF INSPECTOR GENERAL U.S. DEPARTMENT OF THE INTERIOR

JUL 28 2023

Michael J. Roark  
Deputy Inspector General for Evaluations  
Department of Defense Office of Inspector General  
4800 Mark Center Drive  
Alexandria, VA 22350

Subject: U.S. Department of the Interior Office of Inspector General Response to External Peer Review Draft Report

Dear Mr. Roark:

Thank you for the opportunity to respond to the External Peer Review draft report prepared by your office for the U.S. Department of the Interior Office of Inspector General's (DOI OIG's) inspection and evaluation organization. We are pleased that the External Peer Review concluded that the Office of Audit, Inspections, and Evaluation's (AIE's) policies and procedures were generally consistent with the seven Blue Book standards<sup>1</sup> and that the four projects reviewed generally complied with the Blue Book standards.

Your letter states that our office has not completed corrective action for one partially unimplemented recommendation from our 2019 peer review, which was led by the Department of Health and Human Services OIG.<sup>2</sup> This recommendation relates to the current Blue Book planning standard that states, "Inspection organizations must have a basis or rationale for the selection of inspection topics."<sup>3</sup> The 2019 peer review report recommended that we develop a written policy addressing the research, selection, and prioritization of audit, inspection, and evaluation projects for inclusion in the AIE annual work plan.

We believe that the substantial changes that we have made to our annual planning process satisfy this Blue Book requirement and implement the intent of the 2019 recommendation. Specifically, since the 2019 peer review, we have made numerous changes to our annual work planning policies and procedures to better align with the Blue Book planning standard, and we are pleased that you described those changes in your report. Most notably, in 2021, we reassessed many AIE processes, which ultimately resulted in an initiative through which we significantly modified our annual work planning. In 2022, we completed this initiative, which incorporated a more risk-based, strategy-driven, and collaborative approach. This new process fulfills the Blue Book planning standard and has been documented and communicated to all AIE

<sup>1</sup> The Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation* (the "Blue Book"), December 2020, includes seven standards: Independence, Competence, Planning, Evidence Collection and Analysis, Reporting, Follow-up, and Quality Control.

<sup>2</sup> *OIG Final Report: Department of Interior Inspection and Evaluation External Peer Review Report*, dated September 5, 2019.

<sup>3</sup> Blue Book, Standard 3: Planning, Requirement: Topic Selection (3.1). The requirement in place at the time of the Department of Health and Human Services OIG review stated that "[i]nspections are to be adequately planned."

staff. Accordingly, we have considered the 2019 recommendation fully implemented since September 30, 2022.

With respect to the specific recommendation to develop a written policy relating to annual planning, we acknowledge that we have not completed this project. There are various ways that an organization can meet the planning standard in the Blue Book, and, although it is not compulsory, one approach is developing a standard operating procedure (SOP). We began drafting such an SOP regarding our annual planning process in 2020, but, as part of the 2021 reassessment, we postponed finalization of this SOP. Now that we have completed our overall revisions to our work planning process, we are fully committed to drafting and issuing the associated SOP by September 30, 2023.

We appreciate the thoroughness of your review. If you have any questions about our corrective action or otherwise, please contact me at 202-208-5745, or your staff may contact Morgan Aronson at 571-279-5052.

Sincerely,



Kathleen Sedney  
Assistant Inspector General for Audits, Inspections, and Evaluations  
U.S. Department of the Interior