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Office of the Inspector General Information Quality Guidelines

The guidelines set forth below have been adopted pursuant to Section 515 of P.L. 106-554. They apply to Office of the Inspector General (OIG) audit and inspection reports and to those investigative reports undertaken by the OIG's Office of Oversight and Review that are posted on the OIG's web site. The guidelines do not apply to reports of investigation of employee misconduct or illegal activity that are submitted to Federal or State prosecutors for purposes of criminal prosecution or to Department components for purposes of administrative discipline. Nor will they apply to memoranda of law, or other legal advice, prepared by the OIG Office of General Counsel (OGC) to assist OIG components in the performance of their responsibilities.

The guidelines are intended to ensure accuracy in OIG reports disseminated to the public. The steps described below reflect the OIG normal practice and may vary to some degree from one review to another. This description does not confer any rights upon a subject or witness of an OIG investigation to a pre-issuance review, which is reserved to the Inspector General's discretion and judgment. The remedies provided in these guidelines are limited to that which is set forth below.

Oversight Management Responsibility

The Counselor to the Inspector General will be responsible for overall implementation and oversight of information quality guidelines for the OIG. The OIG's OGC will be responsible for receiving and responding to requests for corrections and for producing the annual report to OMB regarding complaints and how they were addressed. The Deputy Inspector General will be responsible for considering and responding to requests for reconsideration of requests for corrections.

Standards for Disseminated Information

The OIG has adopted standards of quality consistent with the OMB and DOJ guidelines, which assure utility, objectivity, and integrity. In addition, statistical information disseminated by the OIG is based on sound statistical methods and the principle of transparency. Finally, influential information is subject to an added level of scrutiny.

For purposes of these guidelines, the following definitions apply:

<u>Utility</u> means that the information to be disseminated is useful to its intended users, including the public.

<u>Objectivity</u> means that disseminated information is substantively accurate, clear, complete, and presented in an unbiased manner.

Integrity means that information is protected from unauthorized access,

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corruption, or revision to ensure that disseminated information is not compromised through corruption or falsification.

<u>Sound statistical methods</u> means that methods are used to produce information that is accurate, reliable, and unbiased.

<u>Transparency</u> refers to a clear description of the methods, data sources, assumptions, outcomes, and related information that will allow the data user to understand how the information produced was designed or produced.

<u>Influential information</u> means information that is expected to have a clear and substantial impact at the national level on major public or private policy decisions.

Application of Standards of Quality by the OIG

OIG Audits

The OIG Audit Division is responsible for independent audits of Department programs, computer systems, and financial statements, as well as audits of entities doing business with or receiving benefits from the Department. Except where the dissemination of an audit would undermine national security or reveal sensitive law enforcement information, audits of Department programs and operations are posted on the OIG web site. Summaries of audits of outside entities also are posted on the OIG web site.

The Audit Division has standards and review procedures in place that assure that information disseminated to the public is reviewed for objectivity, utility, integrity, the use of sound statistical methods, and transparency of methods, sources, assumptions, and outcomes.

The Audit Division adheres to the <u>Government Auditing Standards</u>, issued by the Comptroller General of the United States (the Yellow Book), and the <u>Inspector General Manual</u> (IG Manual). The Yellow Book prescribes generally accepted government auditing standards and the IG Manual establishes the policies and procedures to be followed by the Audit Division, including the supervisory review of audit working papers and reports and the independent referencing of significant audit reports prior to issuance. Further, the Audit Division undergoes both management and peer reviews on a recurring basis.

In addition to these standards, each audit is subject to extensive review within the Audit Division. Audits of Department operations and programs (internal audits) also are reviewed at OIG Headquarters. Also, a copy of each internal audit report is provided in draft to the Department component that was the subject of the audit for review and comment prior to final dissemination. The audited entity's comments are published in the final report.

Prior to posting on the OIG website, the report is reviewed by the OIG OGC to assure compliance with the Privacy Act and the Trade Secrets Act.

Evaluation and Inspections Reports

The Evaluation and Inspections Division (E&I) provides an alternative mechanism to traditional audits and investigations to review Department programs and activities. Except where the dissemination of an E&I report would undermine national security or reveal sensitive law enforcement information, E&I reports are posted on the OIG

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web site.

In accord with the intent of PL 106-554, E&I follows guidelines ensuring that the information in E&I reports is objective, useful, and based on sound evaluation principles, including the proper use of statistical methods. E&I reports also list sources, assumptions, and outcomes.

E&I follows the <u>Quality Standards for Inspections</u> promulgated by the President's Council on Integrity and Efficiency, issued in March 1993. These guidelines, referred to as the "Blue Book," address 12 major standards for ensuring quality work: Qualifications, Independence, Due Professional Care, Quality Control, Planning, Data Collection and Analysis, Evidence, Supporting Documentation, Timeliness, Fraud and Other Illegal Acts, Reporting, and Follow-up. The OIG Manual sets forth additional procedures to ensure the quality of E&I reports.

In addition to these standards and procedures, each report undergoes extensive review within the E&I Division and OIG Headquarters. Also, a draft of the report is provided to the component that is the subject of the review for comment prior to final publication. The component's comments are published in the final report.

Prior to posting on the OIG web site, the report is reviewed by the OIG OGC to ensure compliance with the Privacy Act and the Trade Secrets Act.

Office of Oversight and Review Reports

The OIG's Oversight and Review Unit (O&R) investigates high profile and sensitive matters involving Department programs or senior Department employees, often at the request of the head of a Department component or Congress. O&R reports that are disseminated in their entirety or in summary form on the OIG web site often constitute "influential information," as defined above. Accordingly, extra care is taken to assure that the O&R reports are objective and accurate.

During the investigation, important interviews are attended by two OIG representatives as a means of verifying what was discussed. Particularly important interviews are tape recorded or memorialized in an affidavit, sworn to and signed by the interviewee. Documents, photographs, electronic media, and other evidence collected during the investigation are catalogued or inventoried. These catalogues and inventories are made part of the official work papers of the investigation.

Attorneys trained in the handling, analysis, and presentation of evidence normally prepare O&R reports. O&R strives to present to the reader the salient evidence that supports a proposed conclusion or finding and to distinguish opinion from factual assertion.

The report of investigation is reviewed for accuracy by investigative team members and by O&R supervisors. In the case of reports that constitute "influential information," O&R normally produces a draft report that cross-references the investigation work papers. These reports are subject to intensive review by OIG Headquarters, including review and comment by the Inspector General. In addition, in such investigations, O&R normally allows subjects of the investigation to read and provide comments on the portions of the report that relate to them.

Prior to posting on the OIG web site, the report is reviewed by the OIG OGC to assure compliance with the Privacy Act and the Trade Secret Act.

Information Correction Request and Appeal Process

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<u>Submitting a Formal Request for Correction</u>. All requests for correction of OIG information must be submitted by letter, fax, or e-mail to the OIG's OGC. Requests for correction should include the following information:

- A statement that the request for correction of information is submitted under the OIG's Information Quality Guidelines.
- Requestor contact information, including the name, mailing address, telephone number, fax number (if any), e-mail address (if any), and organizational affiliation (if any) of the person requesting the correction.
- Description of information to be corrected, including the name of the OIG
 report or data product, the date of issuance or other identifying information,
 such as the URL of the web pages, and a detailed description that clearly
 identifies the specific information contained in that report or data product for
 which a correction is being sought.
- Explanation of noncompliance with the OMB Information Quality Guidelines and/or OIG Information Quality Guidelines. This should include an explanation that describes how information fails to meet either the OMB or OIG Information Quality Guidelines.
- Explanation of the effect of the alleged error. An explanation that describes how the alleged error harms the requestor or how a correction would benefit the requestor.
- Recommendation and justification for how the information should be corrected. An explanation that gives the requestor's specific recommendations for how the information should be corrected and that describes the requestor's position as to why the OIG should adopt those recommendations.
- Supporting documentary evidence, such as comparable data or research results on the same topic, which will help in evaluating the merits of the request.

Requestors should be aware that they bear the "burden of proof" with respect to the necessity for correction as well as with respect to the type of correction they seek. The OIG will base its decision on the merits of the information provided by the requestor and will not attempt to contact the requestor to obtain additional information when the submission by the requestor is incomplete.

OIG Review of the Request for Correction

The request for correction will be processed by the OGC. Based on the explanation and evidence submitted with the request for correction, the OIG office that produced the report will conduct a review of the information being challenged, the processes that were used to create and disseminate the information, and the conformity of the information and those processes with both OMB's and OIG's Information Quality Guidelines. The preparing office will submit its response to the request for correction to the OGC. After it has completed its review of the request for correction and the response, and consulted with OIG Headquarters, the OGC will determine whether a correction is warranted, and, if so, what corrective action it will take.

Corrective action will be determined by the nature and timeliness of the information involved and such factors as the significance of the error on the use of the information, the magnitude of the error. The OIG is not required to change, or in any way alter, the content or status of information based only on the receipt of a request

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for correction.

The OIG need not respond substantively to frivolous or repetitive requests for correction. Nor does the OIG have to respond substantively to requests that concern information not covered by the guidelines or from a person whom the information does not affect.

OIG Response to the Request for Correction

After the OGC has made its final determination pertaining to a request for correction of information, it will respond to the requestor by letter, e-mail, or fax. The response will explain the findings and the actions to be taken (if any) in response to the complaint.

The OIG will normally respond to requests for correction of information within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, the OIG will inform the requestor that more time is required and provide an estimated decision date.

Request for Reconsideration of OIG's Decision

If the requestor disagrees with the OIG's denial of the request or with the corrective action the OIG intends to take, the requestor may file a request for reconsideration with the Deputy Inspector General (Reconsideration Official). Persons desiring to file a request for reconsideration should submit the request by letter, fax, or e-mail. Persons requesting reconsideration also should submit written material to support their case for reconsideration. They should not resubmit the information originally submitted to support the request for correction.

Requests for reconsideration must be filed with the OIG (postmarked or shipped by an overnight delivery service) within 35 calendar days of the date that the OIG transmitted its decision on the original request for correction. Requests for reconsideration that are received by the OIG after the 45-calendar day deadline may be denied as untimely.

OIG Review and Response to the Request for Reconsideration

The Deputy Inspector General will review the information in question and the material submitted in support of the request for reconsideration, the material submitted with the original request for correction, and the OIG' response to that request. The Deputy Inspector General then will arrive at a decision regarding the request for reconsideration.

After the Deputy Inspector General has made a decision on the request for reconsideration, the OIG will respond to the requestor by letter, e-mail, or fax. The response will explain the Deputy Inspector General's decision and the action the OIG will take (if any) in response to the request for reconsideration. The Deputy Inspector General's decision is final and is the last available remedy under these procedures.

The OIG will respond to all requests for reconsideration within 45 calendar days of receipt.

Annual Report

Beginning on January 1, 2004, the OIG will submit a report to the Office of Management and Budget on the number and nature of complaints received by the

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OIG regarding its compliance with Sec. 515 of Public Law 106-554 and how those complaints were resolved.