



Office of the
Inspector General

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

July 22, 2021

External Peer Review Report

Kurt W. Hyde
Inspector General
Library of Congress
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Washington, DC 20540-1060

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*. The peer review was conducted from May 19, 2021 through July 22, 2021.

We assessed the extent to which the Library of Congress (LOC), Office of Inspector General (OIG) met the seven Blue Book standards tested, specifically: (1) Quality Control; (2) Planning; (3) Data Collections and Analysis; (4) Evidence; (5) Records Maintenance; (6) Reporting; and (7) Follow-up. This assessment included a review of the LOC OIG's internal policies and procedures as of May 2020, implementing the seven required CIGIE *Quality Standards for Inspection and Evaluation* (Blue Book), January 2012. It also included a review of selected inspection and evaluation reports issued between April 1, 2018 and March 31, 2021, to determine whether the reports complied with the covered Blue Book standards and the LOC OIG's internal policies and procedures.

We determined that the LOC OIG's policies and procedures generally met the seven Blue Book standards addressed in the external peer review - Quality Control; Planning; Data Collections and Analysis; Evidence; Records Maintenance; Reporting; and Follow-up. Of the two reports reviewed, both reports generally met the Blue Book standards and complied with LOC OIG's internal policies and procedures.

We have issued a Letter of Comment dated July 22, 2021 (Enclosure 1) that sets forth specific findings, recommendations, observations, suggestions, and best practices

identified during the peer review. The LOC OIG management officials provided a written response to our Summary Report (Enclosure 2). No comments were made.

Sincerely,

Norbert E. Vint
Deputy Inspector General Performing the Duties of
the Inspector General

ENCLOSURE 1: Letter of Comment, Scope and Methodology - July 22, 2021.

The peer review period was April 1, 2018 to March 31, 2021. Six reports were published during the review period. The Review Team selected the following two reports for review: (1) *The Library Continues to Face Challenges Ensuring Effective Financial Management and Reporting*, dated May 28, 2020; and (2) *No Improper Payments Were Found for Period under Review but Personally Identifiable Information Was Discovered*, dated June 27, 2019. The Review Team conducted no on-site visits due to COVID-19 restrictions, but relevant personnel were available via email, teleconference, or videoconference to answer any questions and all workpapers were available remotely.

RESULTS AND FINDINGS

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

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

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

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

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

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

DATA COLLECTION AND ANALYSIS: “The collection of information and data will be focused on the organization, program, activity, or function being inspected, consistent with the inspection objectives, and will be sufficient to provide a reasonable basis for reaching conclusions.” This standard requires covered I&E organizations to describe the project’s sources of data and information in the supporting documentation, ensure information is appropriately scoped, employ procedures to ensure data reliability and validity, and ensure that the confidentiality of sources and sensitive information is safeguarded. Key elements of the standard related to data analysis include ensuring that data is reviewed for accuracy and reliability, information is appropriately presented and documented, procedures provide for supervisory review, and findings satisfy objectives.

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

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

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

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

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

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

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

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

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

ENCLOSURE 2: Library of Congress Comments to the Draft Report



July 19, 2021

Norbert E. Vint
Deputy Inspector General
Performing the Duties of the Inspector General
U.S. Office of Personnel Management
1900 E Street, N.W.
Washington, DC 20415

Subject: Response to Inspection and Evaluation External Peer Review Draft Report

Thank you for the opportunity to comment on the draft report. We appreciate the Review Team's independent review of our office's compliance with the seven required standards of the *CIGIE Quality Standard for Inspection and Evaluation*, January 2012 (Blue Book) and their assessment of our internal policies and procedures.

We have no comments on the report, but wish to express our appreciation to your staff for their time, dedication, and professionalism in conducting this peer review and suggestions made.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kurt W. Hyde". The signature is stylized and cursive.

Kurt W. Hyde
Inspector General