



March 15, 2023

Joyce T. Willoughby
Inspector General
Office of Inspector General
Equal Employment Opportunity Commission
131 M Street NE, Suite 6NE23M
Washington, D.C. 20507

SUBJECT: External Peer Review Letter of Comment

Dear Ms. Willoughby,

We have reviewed the internal policies and procedures, specifically the *Evaluation Policies and Procedures Manual* dated March 2022, for implementing the Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Quality Standards for Inspection and Evaluation*, December 2020 (Blue Book) for the inspection and evaluation (I&E) organization of the U.S. Equal Employment Opportunity Commission (EEOC) Office of Inspector General (OIG). We also reviewed three reports for compliance with the applicable version of Blue Book standards and the EEOC OIG's internal policies and procedures. CIGIE issued a revised version of the Blue Book in December 2020, which was effective for inspections and evaluations beginning on or after January 1, 2022. During our report review, we used the Blue Book standards in effect at the time each engagement was started and noted the applicable Blue Book versions in the findings below.

We issued our Peer Review Report on March 15, 2023, in which we summarized our overall conclusions as to the I&E organization's compliance with the Blue Book standards, specifically that EEOC OIG generally complied with these standards. That report should be read in conjunction with the comments in this letter, which were considered in reaching our conclusions. The findings or noncompliances described below were not considered to be of sufficient significance to impact our overall conclusions. The findings or noncompliances also did not rise to the level of a significant noncompliance affecting whether a Blue Book standard was complied with.¹

¹ A finding is only included in the Letter of Comment. It is not included in the Peer Review Report because the finding did not rise to the level of a significant noncompliance.

Finding 1. Reporting

The 2012 Blue Book, which applies to the report in question, states that inspection reports normally should state that the inspection was conducted in accordance with the CIGIE's *Quality Standards for Inspection and Evaluation*. One of three reviewed reports, the one completed by a contractor, did not include the required statement.

Recommendation. OIG management should develop and implement a control to ensure reports written by contractors contain the required QSIE compliance statement.

Views of Responsible Official. Agree.

Finding 2. Independence

Requirement 1.2 of the 2020 Blue Book Independence Standard states that inspectors must document all known threats to independence or document that there are no known threats to their independence for each inspection they are assigned to conduct. Additionally, Application Guidance 1.1a of the 2020 Blue Book Independence Standard states that independence requirements apply to anyone performing or supervising inspection work, to include anyone that may directly influence the outcome of the inspection. Similarly, the 2012 Blue Book states the inspection organization and each individual inspector should be free from impairments to independence. For the two engagements completed by OIG staff, we noted OIG senior managers and staff members serving as independent referencing reviewers did not always complete independence statements. For the engagement completed by a contractor, the company as a whole completed an independence statement, but individual contractor employees and the OIG Contracting Officer's Representative did not complete independence statements. We found that EEOC OIG policies and procedures were not clear regarding who should complete independence statements. Independence statements are critical to ensure that inspectors, inspection organizations, and their reports are impartial and without bias in both fact and appearance.

Recommendation. OIG management should clarify written evaluation policies and procedures to specify which OIG staff members must complete independence statements and whether employees of contractors need to complete individual independence statements.

Views of Responsible Official. Agree.

Finding 3. Quality Control – System of Quality Control

Requirement 7.1 of the 2020 Blue Book Quality Control Standard states that inspection organizations must implement a system of quality control that provides the inspection organization with reasonable assurance that the organization and its personnel follow the Blue Book when conducting inspections. The 2012 Blue Book states OIGs should have appropriate internal quality controls for inspection work. The EEOC OIG evaluation manual states that quality control checklists must be completed before issuing the final report. For the two reports completed by EEOC OIG staff members, the quality control checklists (Evaluation Quality Review Checklist and Draft Report Quality Review Checklist) were not completed consistently. One of these engagements did not have an Evaluation Quality Review Checklist. The other engagement had an incomplete, unsigned Evaluation Quality Review Checklist and did not have the Draft Report Quality Review Checklist. EEOC OIG's policies and procedures require that evaluators must complete these checklists to ensure the project and the report meet the required standards.

Recommendation. OIG management should develop and implement a control to ensure quality review checklists are completed.

Views of Responsible Official. Agree.

Sincerely,

Nicholas J. Novak
Inspector General

Enclosure

Reviewed Organization Comments to Draft Letter of Comment




U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, D.C. 20507

Office of the
Inspector General

March 14, 2023

MEMORANDUM

TO: Nicholas J. Novak , Inspector General
Pension Benefit Guaranty Corporation

FROM: Joyce T. Willoughby Joyce T.
Inspector General Willoughby  Digitally signed by Joyce
T. Willoughby
Date: 2023.03.14
08:30:33 -04'00'

SUBJECT: EEOC External Peer Review Draft Letter of Comment

Thank you for the Letter of Comment that describes findings that were not considered to significantly impact compliance with a Blue Book standard. We agree with the recommendations and will take them into account when we review our *Evaluation Manual*, other guidance, and controls.