



## Modified External Peer Review Report Draft

December 3, 2020

To Milton A. Mayo, Jr., Inspector General  
U.S. Equal Employment Opportunity Commission  
Office of Inspector General

This required “modified” 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 July 31, 2020 through December 3, 2020.

The CIGIE External Peer Review Team (Review Team) assessed the extent to which the U.S. Equal Employment Opportunity Commission (EEOC) Office of Inspector General (OIG) met seven CIGIE *Quality Standards for Inspection and Evaluation* (Blue Book) standards, January 2012, specifically: Quality Control; Planning; Data Collections and Analysis; Evidence; Records Maintenance; Reporting; and Follow-up. This assessment included a review of EEOC OIG’s *Evaluation Policies and Procedures Manual* (the Manual), June 2020, implementing the seven required CIGIE Blue Book standards. The Review Team determined that EEOC OIG’s internal policies and procedures, as presented in the Manual, generally met the seven Blue Book standards addressed in the modified external peer review.

We have issued a Letter of Comment dated November 9, 2020 (Enclosure 1) that sets forth the results and findings and a suggestion identified during the peer review. The EEOC OIG management officials provided a written response to our Summary Report (Enclosure 2) in which they concurred with our conclusions.

Jennifer Fain, Acting Inspector General

Enclosures as  
stated

## ENCLOSURE 1: Letter of Comment/Scope and Methodology

CIGIE approved EEOC OIG's request for a modified external peer review on the premise that the EEOC OIG does not have the technology to facilitate the remote review of reports and work papers. The modified external peer review includes the assessment of the EEOC OIG's internal policies and procedures implementing the seven required Blue Book standards, January 2012. It does not include a review of inspection and evaluation reports to assess the reports' compliance with the Blue Book standards and EEOC's internal policies and procedures.

### RESULTS AND FINDINGS

#### INTERNAL POLICIES AND PROCEDURES

Based on the Review Team's assessment, if implemented, EEOC OIG's internal 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 EEOC OIG's internal policy and procedures against the seven Blue Book standards included in this review.

#### QUALITY CONTROL

The CIGIE standard for inspection work is: *"Each OIG organization that conducts inspections should have appropriate internal quality controls for that work."* Key elements of this standard include establishing the mechanisms for quality control, documenting those quality control mechanisms, and ensuring adequate supervision.

**Finding:** The EEOC OIG met the standard by establishing appropriate quality control policies and procedures.

**Suggestion:** While the Review Team considers the EEOC OIG supervision to be overall adequate, implementation of a supervisory timeline can certainly further enhance the supervisory process.

#### PLANNING

The CIGIE standard for inspection work is: *"Inspections are to be adequately planned."* Key elements of this standard include creating a project work plan, coordination (both internal and external), and research.

**Finding:** The EEOC OIG met the standard by establishing its planning policies and procedures.

## **DATA COLLECTION AND ANALYSIS**

The CIGIE standard for inspection work is: *“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 inspection and evaluation (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 the data is reviewed for accuracy and reliability, information is appropriately presented and documented, procedures provide for supervisory review, and findings satisfy objectives.

**Finding:** The EEOC OIG sufficiently met the standard by establishing its data collection and analysis policies and procedures.

## **EVIDENCE**

The CIGIE standard for inspection work is: *“Evidence supporting inspection findings, conclusions, and recommendations 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 the evidence presented 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 EEOC OIG met the standard through implementation of its evidence policies and procedures.

## **RECORDS MAINTENANCE**

The CIGIE standard for inspection work is: *“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 EEOC OIG met the standard by establishing its records maintenance policies and procedures.

## **REPORTING**

The CIGIE standard for inspection work is: *“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 EEOC OIG met the standard by establishing its reporting policies and procedures.

### **FOLLOW-UP**

The CIGIE standard for inspection work is: *“Appropriate follow-up will be performed to ensure that any inspection recommendations made to the 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 EEOC OIG met the standard by establishing its follow-up policies and procedures.

# ENCLOSURE 2: Reviewed Organization Comments to Draft Report



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

Office of the Inspector General

December 1, 2020

## MEMORANDUM

**TO:** Jennifer Fain, Acting Inspector General  
Export-Import Bank of the United States

**FROM:** Milton A. Mayo Jr.   
Inspector General

**SUBJECT:** Draft Modified External Peer Review Report Draft

Thank you for the opportunity to provide comments on the draft report of your modified peer review of our evaluation program. We are pleased that this external peer review has confirmed that the evaluation program's policies and procedures met the seven standards from the CIGIE Quality Standards for Inspection and Evaluations (Blue Book). We concur with the findings and will take under review your suggested change in policy during our annual quality control review. We appreciate the professionalism your team displayed during the review.