HOLDING OURSELVES ACCOUNTABLE:

CIGIE’s Integrity Committee

- Kevin H. Winters
  Chairperson

- Deborah J. Jeffrey
  Vice Chairperson
Integrity Committee Members

Four Inspectors General

Kevin Winters, Amtrak
Deborah Jeffrey, CNCS
Robert Storch, NSA
Andrew Katsaros, FTC

FBI Representative

Catherine Bruno
Asst. Director of Integrity & Compliance

OGE Representative

Dale Christopher
Deputy Director for Compliance
“To receive, review, and refer for investigation allegations of wrongdoing that are made against Inspectors General and staff members of the various Offices of Inspector General.”

Overview of the Integrity Committee Process

Incoming Written Complaint

Allegation Review Group
Timeframe = 7 days

- Criminal
- Prohibited Personnel Practice
- Other

DOJ for Review

OSC for Review

Integrity Committee

Time Frame: 30 days

- No → DOJ for Review

- No → OSC for Review

Time Frame: 150 days

- Initiate Investigation → Respondent Review & Comment on Draft
- Issue Final ROI to Appointing Authority & Oversight Committees

Additional Info Required? No → Closure w/ Notifications
Integrity Committee Review Process

To be actionable, the complaint must both:

• Concern a **Covered Person**, and

• **Allege** Wrongdoing
Covered Persons

- Approximately 474

- Inspector General
- Inspector General’s direct reports
- Staff members designated by IG
- Special Counsel or Principal Deputy Special Counsel
- Anyone Acting or Interim in the above roles
- Legislative Branch OIG investigators
Complaint must allege **Wrongdoing**

- Abuse of authority

- Substantial misconduct, such as gross mismanagement, gross waste of funds, or a substantial violation of law, rule, or regulation

- Conduct that undermines the independence or integrity reasonably expected of the position
IC Review Outcomes

- Close the matter
- Refer the matter to another agency
- Request additional information
- Request a response
- Make findings on the record
- Refer the matter for investigation
- Absent cognizable wrongdoing, refer the matter to the CIGIE Chairperson

Closure of Integrity Committee Case

Dear [Name],

The Integrity Committee (IC) of the Council of the Inspectors General on Integrity and Efficiency received and reviewed a complaint alleging that you abused your authority, grossly mismanaged the [redacted] Office of Inspector General, and engaged in conduct undermining the independence of your position.

After thoroughly reviewing the allegations, your response, and the supporting information provided, the IC determined, pursuant to Integrity Committee Policies and Procedures – 2018, paragraph 7.C., that it will take no further action at this time. This determination was made solely pursuant to the IC’s authorities and is not binding on any collateral or other proceeding.

Sincerely,

[Signature]

Kevin H. Winters
Chairperson
Integrity Committee
What if the IC asks me to respond to allegations?

• Don’t Panic and Do Something You May Regret, Like . . .
  • Attempt to identify the complainant
  • Retaliate
  • Pressure or manipulate potential witnesses

• Contact IC staff if you have questions

• Respond
  • Address each allegation professionally
  • More than a denial; provide relevant facts and evidence
  • Respond within 20 days
What if the IC notifies me that I am a Respondent in an IC investigation?

**Do**

- Cooperate
- Encourage staff to cooperate
- Follow directions of investigating OIG

**Don’t**

- Interfere w/ the investigation
- Remove/destroy evidence or tell witnesses what to say
- Ask staff what they told investigators
- Retaliate
INVESTIGATION PROCESS

- Assisting OIG Conducts Investigation
- OIG Provides Draft Report to IC for Review
- Draft to Respondent for Comment
- 150 Days
- IC Issues Final Report
- Comments to IC for Review/Consideration
- President
- Agency Head

PAS
DFE
FY19 Data

1035 Incoming Communications

69 Complaints Reviewed by ARG

62 Cases Reviewed by IC

42 cases
27 = wrongdoing was de minimis
12 = pending review by/referred to another agency
3 = vague, conclusory, or previously addressed

15 cases

7 complaints consolidated w/ existing cases

IC requested add’l info in 7 cases and sought a response from 10 respondents for 8 cases

15 cases

Removed duplicates, outside purview, and spam

IC closed 42 cases

Referred for investigation

Council of the Inspectors General on Integrity and Efficiency
Communicating With the Integrity Committee

• Obligation to Refer Matters to the IC

• Effective Transmittals

• Use IC Staff, don’t contact IC members directly
How do I file / refer a complaint?

Integrity-Complaint@cigie.gov

or

Attn: Integrity Committee
CIGIE
1717 H St., NW
Washington, DC 20006