

**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

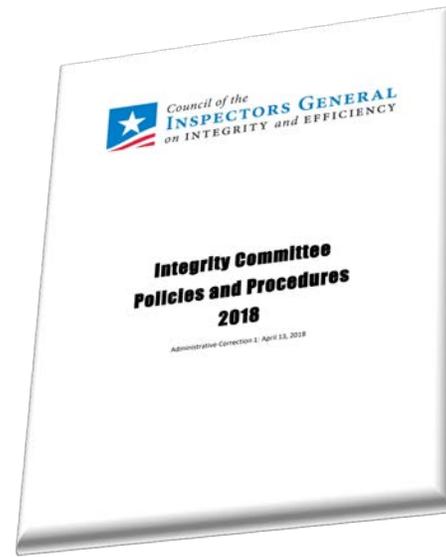
OGE Representative



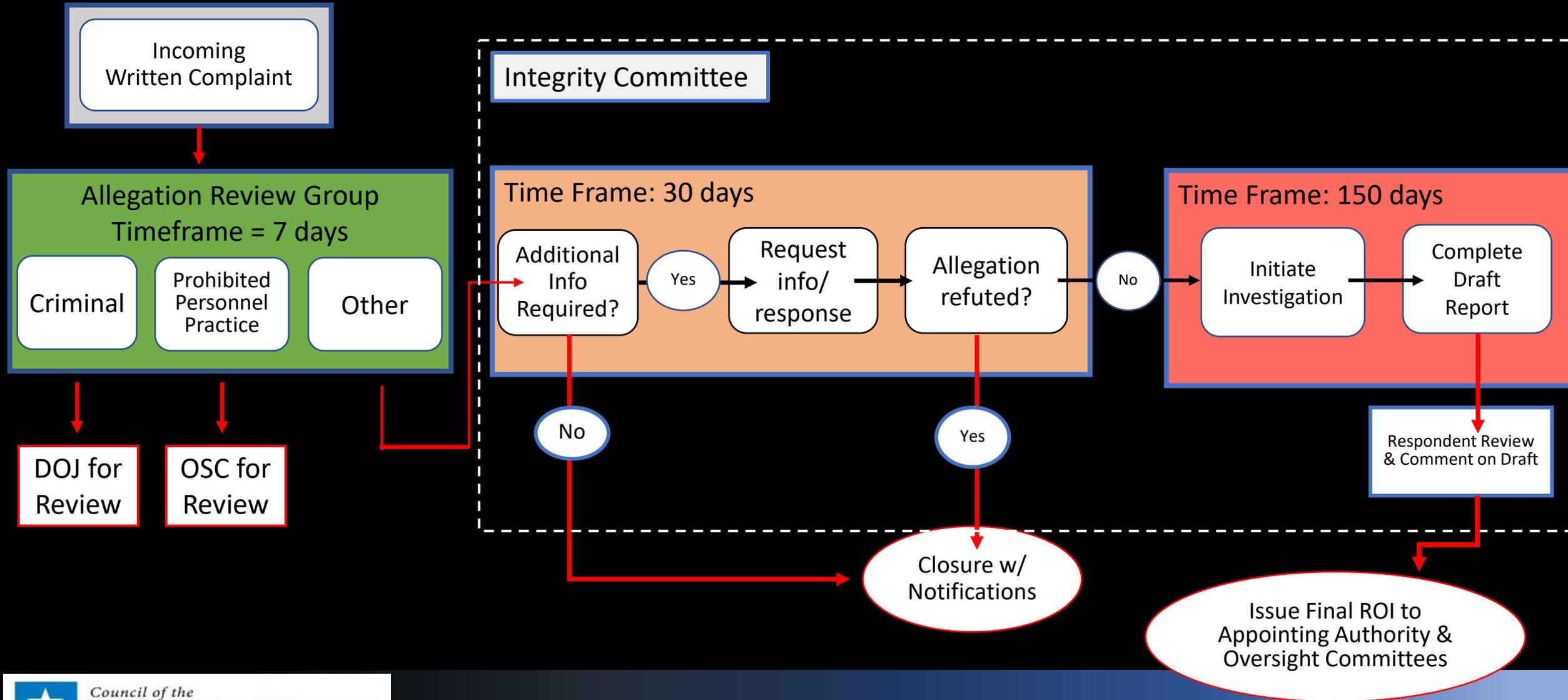
Dale Christopher
Deputy Director for Compliance

“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.”

§11(d), 5 U.S.C. App.

The image shows the "Table of Contents" page from the document. The title "Table of Contents" is at the top left. The date "January 2018" is at the top right. The page lists various sections and their corresponding page numbers. The sections include: 1. Statement of Purpose (1), 2. Powers within the IC's Authority (1), 3. IC Governance (1), 4. Membership (1), 5. IC Chairperson (1), 6. IC Vice Chairperson (1), 7. Legal Advice (1), 8. Disputes (1), 9. Allegation Review Group (1), 10. Working Group (1), 11. Meetings (1), 12. Quorum (1), 13. Voting (1), 14. Removal of IC members and others (1), 15. Mandatory disclosure of investigations (1), 16. Disposition of Staff Members by an Inspector General (1), 17. Referral of Allegations of Wrongdoing to the IC (1), 18. Reporting by an IG (1), 19. Allegations received from other sources (1), 20. Receipt, Initial Review, and Referral of Allegations for Consideration at IC Meeting (1), 21. Review and Referral by the Allegation Review Group (1), 22. Coordination with PEN and OSC on concurrent matters (1), 23. Action by PEN on referred allegations (1), 24. Action by OSC on referred allegations (1), 25. Placement on the IC agenda (1), 26. IC Review Process and Action (1), 27. Threshold standard (1).

Overview of the Integrity Committee Process



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 [REDACTED]

Dear [REDACTED]:

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,



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



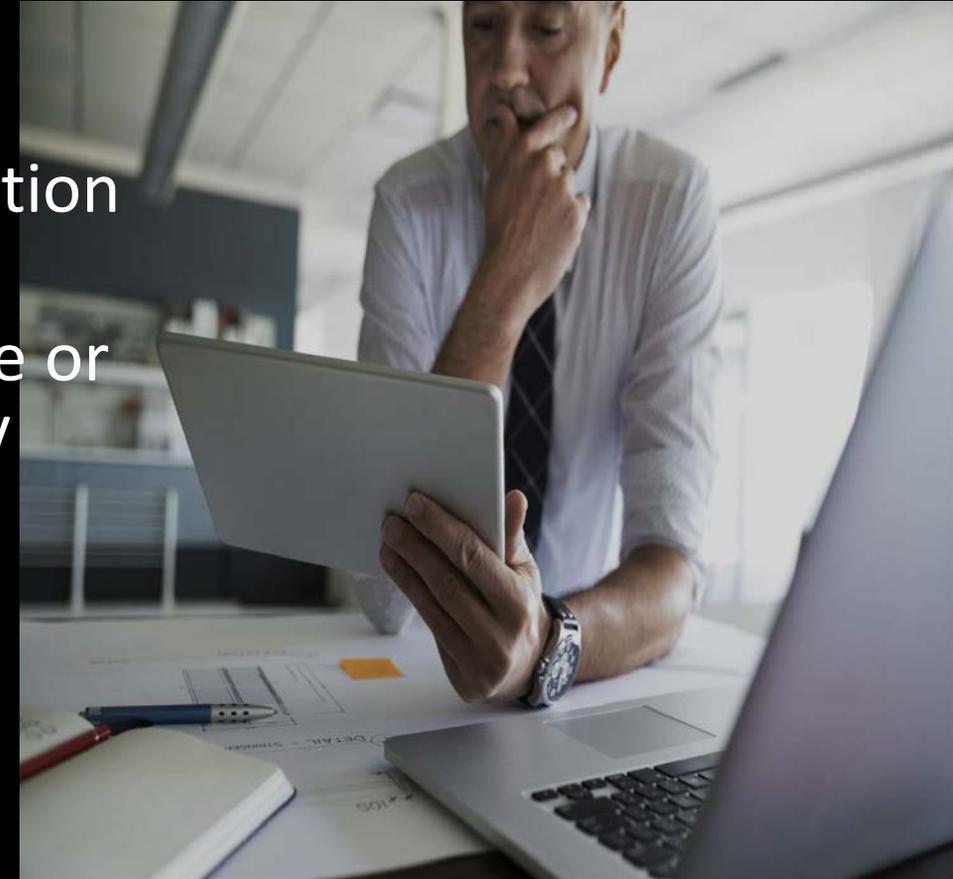
What if the IC notifies me that I am a Respondent in an IC investigation?

Do

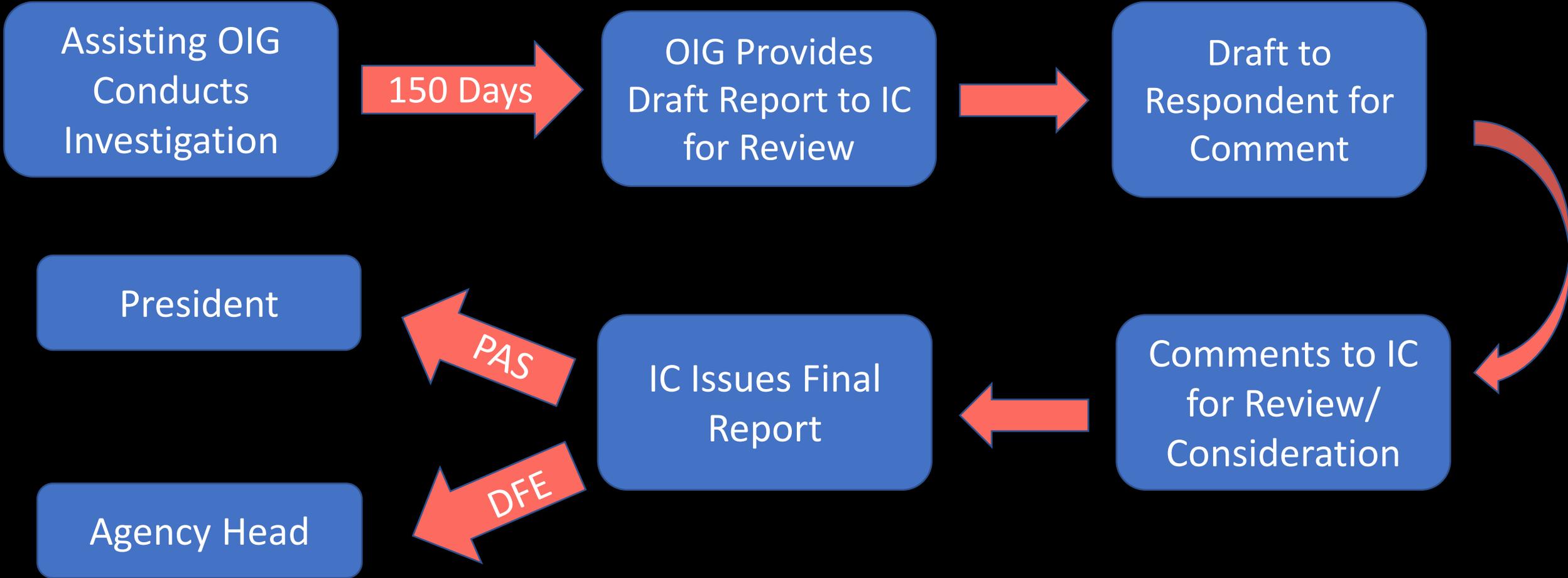
- Cooperate
- Encourage staff to cooperate
- Follow directions of investigating OIG

Don't

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

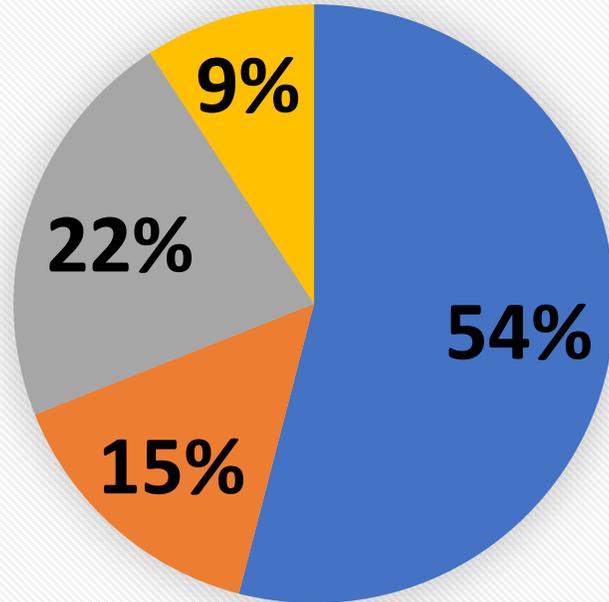


INVESTIGATION PROCESS



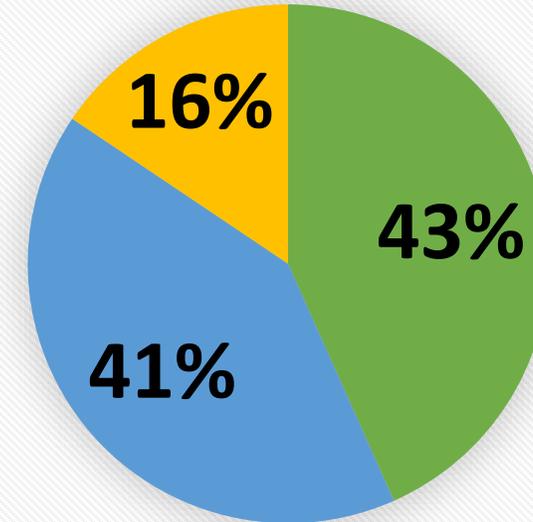
FY19 Data

FY19 Allegations by Position



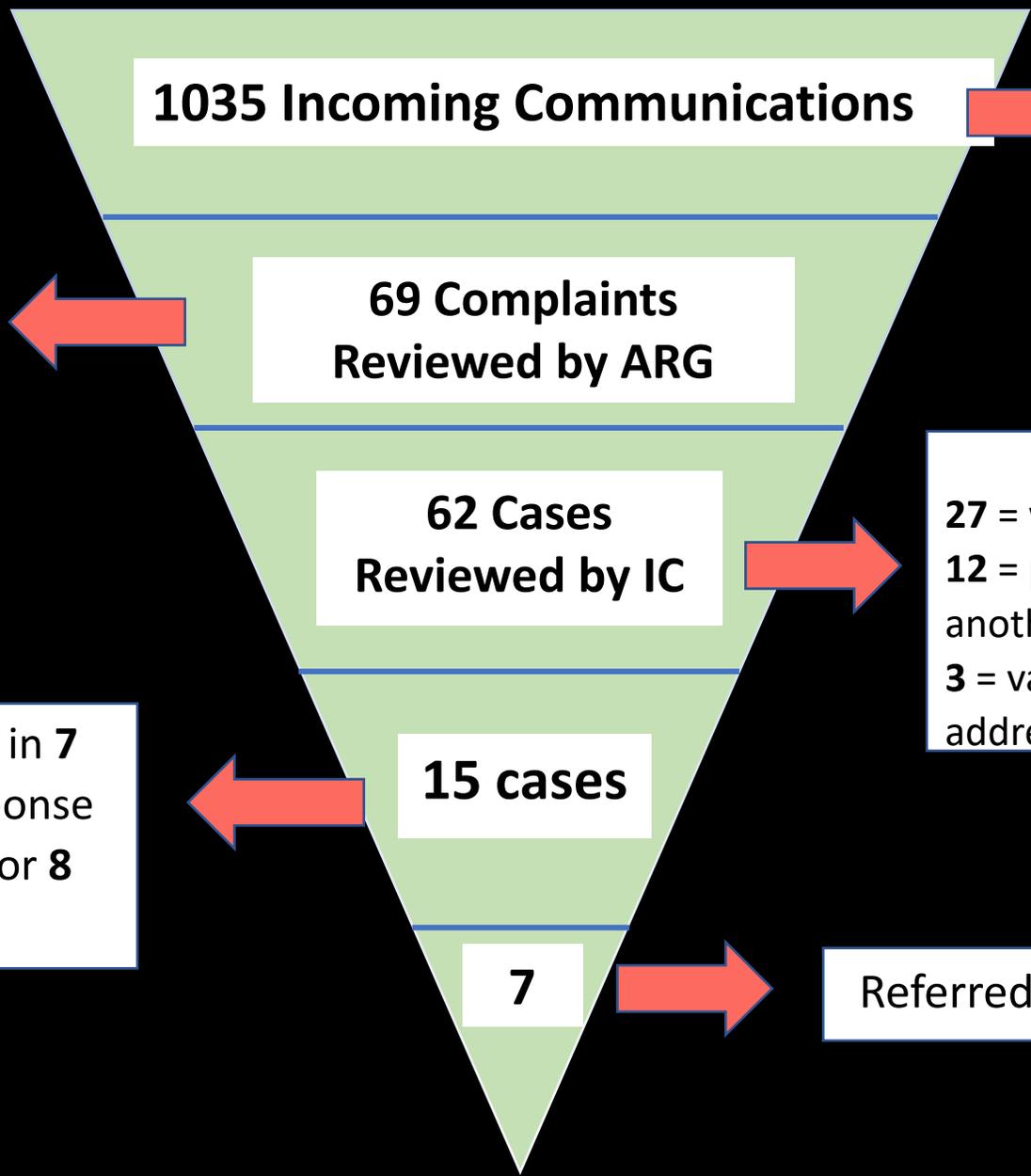
- Inspector General (incl. Acting and former)
- Deputy IG or Counsel to IG
- Assistant IG
- Other Positions

FY19 Allegations by Category



- Abuse of Authority
- Substantial Misconduct
- Conduct Undermining Integrity or Independence

FY19 Data



7 complaints consolidated w/ existing cases

Removed duplicates, outside purview, and spam

69 Complaints Reviewed by ARG

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

62 Cases Reviewed by IC

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

15 cases

Referred for investigation

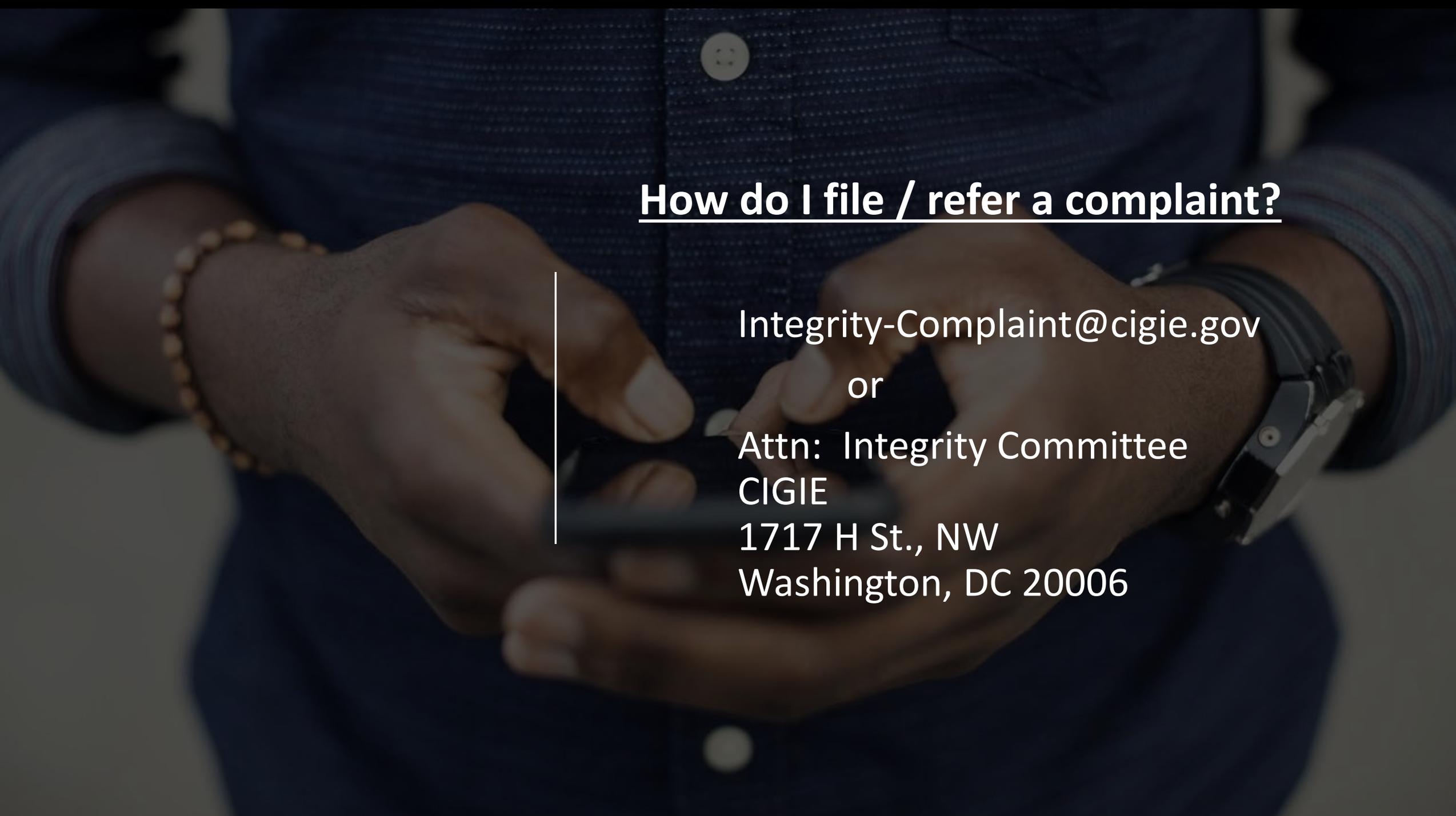
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Communicating With the Integrity Committee

- 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