<u>PURPOSE</u>. This questionnaire is based on the Quality Standards for Investigations (QSI), adopted by the PCIE and ECIE in December 2003.<sup>1</sup> The QSI contains three general standards (Qualifications, Independence, and Due Professional Care) and four qualitative standards (Planning, Execution, Reporting, and Information Management). **Answers to certain questions below may not be readily available or apparent. In these instances, the peer review team should assess whether there is clear, specific and articulable information in the case file to suggest the standard was violated.** 

Appendix C-1 is applicable to all Offices of Inspector General. It is used to review the level of conformity with the standards adopted in the PCIE/ECIE QSI. The review team will examine the existence of adequate policies, procedures, and practices as well as their implementation. Note that the Standards state, in part, "...each OIG should develop and issue an investigations manual to address implementation of these standards, as well as investigative procedures tailored to its particular mission and investigative discipline. How agencies implement them depends upon the unique circumstances of the respective department or agency." **Thus, a "no" answer below does not automatically result in overall non-compliance or systemic problem.** The review team must review the circumstances and consider all relevant information when making a final assessment.

Review Step	N/A	PHAS Polic Proces	cy/	PHAS Consis Prac	stent	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments
		Yes	No	Yes	No			

#### . GENERAL STANDARDS

**A. STAFF QUALIFICATIONS:** This Standard requires that individuals assigned to conduct investigative activities (i.e. investigators) must collectively possess professional proficiency (education, experience, character and physical capabilities) for the task required.

1. Education/Experience – The Standards state it is desirable that all newly appointed investigators possess a four-year degree from an accredited college. However, the standards state that, depending on the specific needs of the agency, allowances may be made to substitute job experience for a college education. Newly hired means any investigator hired since the last peer review or hired during the last 5 years for an agency being reviewed for the first time.

<sup>&</sup>lt;sup>1</sup> This questionnaire will refer to the "PCIE/ECIE" Quality Standards for Investigations until such time the standards are updated to reflect the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

Review Step	N/A	Poli	Procedure		SE 2 stent ctice	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments		
		Yes	No	Yes	No		10/00 00 0			
Do all newly hired investigators possess a degree from a four- year college or have grade appropriate substitute experience?							12/03 QS General Standards A. pg 2			
2. Character – The Standards state that a suitability determination should be made as to the investigator's character, reputation, trustworthiness, and overall fitness. A determination of suitability will be based on the results of a background investigation, including personal interviews, written inquiries and confirmations, record searches, and a review of the applicant's compliance with programs administered by the agency. New hires means any investigator hired since the last peer review or hired during the last 5 years for an agency being reviewed for the first time.										
Has a character suitability review been conducted for all new hires?							12/03 QS, General Standards, section A, pg 2			
<ol> <li>Physical Capabilities – The Standards state that each investigated current statutes, regulations, and agency policy to enable investigated</li> </ol>										
Has the organization developed job-related physical requirements?							12/03 QS General Standards, section A, pg 2			
<ol> <li>Age – The standards state that consideration must be given to n regulations.</li> </ol>	ninimu	m and	maxii	mum a	age red	quirements in ac	cordance with app	licable statutes and		
Has the organization established minimum and maximum age requirements?							12/03 QS General Standards, section A pg 3			
B. Independence - The Standards state that the investigative organization must be free, both in fact and appearance, from impairment to independence; must be organizationally independent; and must maintain an independent attitude. Answers to certain questions pertaining to Independence and Due Professional Care may not be readily available or apparent. In these instances, the peer review team should assess whether there is clear, credible, specific and articulable information to suggest the standard was violated. In the absence of such information, the peer review team should make a determination that the organization is compliant with applicable standards.										

	Review Step	N/A	PHA Poli Proce	icy/	PHASE 2 Consistent Practice		Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments
regard	<b>sonal Impairments</b> – The Standards state that an organization sto each specific individual under investigation. Peer Review teans organization ensure that it and its investigators:								
a.	Are free from official, professional, personal or financial relationships that could affect their investigative judgment?							12/03 QS General Standards, section B pg 5-6	
b.	Are free from preconceived opinions regarding its investigation?							12/03 QS General Standards, section B pg 5	
C.	Have not been previously involved in decision making or in a management capacity regarding its investigation?							12/03 QS General Standards, section B pg 5	
d.	Are free from biases, including those created by political or social convictions regarding its investigation?							12/03 QS General Standards, section B pg 5	
e.	Are free from conflicting financial interests regarding the investigation?							12/03 QS General Standards, section B pg 5	
that wo	ernal Impairments – The Standards state that an organization soluted adversely affect the conduct of independent and objective in the agency's policies intended to thwart external impairments eation ensure:	vestig	ations	and the	he pro	ductio	n of factual repo	rts. Peer Review	teams should
a.	No interference in the assignment of cases or investigative personnel							12/03 QS General Standards, section B pg 6	
b.	No restrictions on funds or other resources dedicated to the investigation or to investigative organizations							12/03 QS General Standards Section B, pg 6	

Review Step	N/A	Poli	SE 1 icy/ edure	Consi	stent	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments		
c. No authority to overrule or to influence the extent and thoroughness of the investigative scope, how the investigation is conducted, who should be interviewed, what evidence should be obtained, and the appropriate content of the investigative report							12/03 QS General Standards Section B, pg 6			
<ul> <li>No denial of access to sources of information, including documents and records.</li> </ul>							12/03 QS General Standards Section B, pg 6			
7. Organizational Impairments – The Standards state that the investigating organization should be outside the staff or line management function of the unit or employees under investigation.										
Is the investigating organization free of organizational impairments?							12/03 QS General Standards Section B, pg 6			
C. Due Professional Care - The Standards state that due professional care should be used in conducting investigations and in preparing related reports. The standard requires a constant effort to achieve professional performance. Answers to certain questions pertaining to Independence and Due Professional Care may not be readily available or apparent. In these instances, the peer review team should assess whether there is clear, credible, specific and articulable information to suggest the standard was violated. In the absence of such information, the peer review team should make a determination that the organization is compliant with applicable standards.										
<b>8.</b> Are investigations conducted in a thorough, diligent, and complete manner, and reasonable steps taken to ensure that all appropriate criminal, civil, contractual, or administrative remedies are considered?							12/03 QS General Standards, Section C, pg 7			
9. Are investigations conducted in accordance with applicable laws, rules, regulations, DOJ guidelines, and with due respect for the rights and privacy of those involved?							12/03 QS General Standards, Section C, pg 7			

Review Step	N/A	Poli	PHASE 1 Policy/ Procedure		SE 2 stent ctice	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments
10. Are the methods and techniques used in investigations appropriate for the circumstances and objectives?							12/03 QS General Standards, Section C, pg 7	
11. Are investigations conducted in a fair and impartial manner and with the perseverance necessary to determine the facts?							12/03 QS General Standards, Section C, pg 7	
12. Is evidence gathered and reported in an unbiased and independent manner in an effort to determine the validity of an allegation or to resolve an issue?							12/03 QS General Standards, Section C, pg 7	
13. Does the OIG have policies and procedures to address non- conformity by investigators/investigative staff with generally accepted standards of conduct for government employees?							12/03 QS General Standards, Section C, pg 7 5CFR 735 "Employee Responsibilities and Conduct". 5CFR 2635 "Standards of Ethical Conduct".	
<b>14.</b> Has the organization issued a weapon to an individual not eligible to carry one, pursuant to the Lautenberg Amendment or other relevant Federal statutes restricting the carrying of firearms?							12/03 QS General Standards, section A, pg 2	
15. Does the organization require timely completion and reporting of investigations?							12/03 QS General Standards, Section C, pg 7	
16. Are the investigative report findings and accomplishments supported by adequate, accurate, and complete documentation in the case file?							12/03 QS General Standards, Section C, pg 7	
17. Does the organization properly address warnings including Miranda, Garrity and Kalkines?							12/03 QS Qualitative Standards, section B, pg 10-11	

Review Step	N/A	Pol	SE 1 icy/ edure	Consi	stent	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments
18. Does the organization properly receive, identify, store, and preserve evidence?							12/03 QS Qualitative Standards, Section D, pg 14.	
<b>19.</b> Does the organization adequately secure, store, and dispose of federal grand jury information consistent with Rule 6(e) of the Federal Rules of Criminal Procedure?							12/03 QS Qualitative Standards, Section D, pg 14.	
20. Does the organization periodically inventory law enforcement or investigations-related accountable property such as credentials, specialized technical/monitoring equipment, firearms and related equipment, and similar items? [Note: The Peer Review Team may perform an inventory check of existing property (full or sample) to verify this. The team may also examine historical inventory records from the reviewed agency.]							12/03 QS General Standards, Section C, pg 6 and 7.	
II. QUALITATIVE STANDARDS								
A. PLANNING – The Standards provide that the investigative orgal objectives to ensure that individual case tasks are performed efficient.					orgar	nizational and ca	se specific prioritie	es and develop
21. Organization Planning								
Does the investigative organization establish organizational and case specific priorities and develop objectives to ensure that individual case tasks are performed efficiently and effectively?							12/03 QS Qualitative Standards, section A, pg 8	
22. Individual Case Planning								

Review Step	N/A		icy/	PHAS Consis Prac	stent	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments			
a. On receipt of an allegation, does the organization evaluate the allegation for possible investigative effort, referral or closure?							12/03 QS Qualitative Standards, section A, pg 8- 9				
b. When appropriate, does the organization establish an individual investigative plan in a timely manner, consistent with instructions provided in the Quality Standards?							12/03 QS Qualitative Standards, section A, pg 9				
B. EXECUTION - The Standards state that the investigative organization conduct investigations in a timely, efficient, thorough, and legal manner.											
23. Are contemporaneous interview notes in an investigation retained based on agency requirements, Federal records regulations, and judicial decisions?							12/03 QS Qualitative Standards, section B, pg 10				
<b>24.</b> Are two investigators present when conducting potentially hazardous or compromising interviews?							12/03 QS Qualitative Standards, section B, pg 10				
25. Are requests for witness confidentiality considered and properly documented?							12/03 QS Qualitative Standards, section B, pg 10				
26. Are investigative activities and results, including interviews, evidence collection and other activities initiated, conducted and reported in accordance with applicable laws, rules and regulations?							12/03 QS Qualitative Standards, section B, pg 10				
27. Was any evidence uncovered during the QAR that the organization failed to safeguard the privacy of those involved in investigations?							12/03 QS Qualitative Standards, section B, pg 10-11				

Review Step	N/A	Poli			SE 2 stent ctice	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments			
<b>28.</b> Does the organization conduct and document supervisory reviews of case activities periodically to ensure that cases are progressing in an efficient, effective, thorough, and legal manner?							12/03 QS Qualitative Standards, section B, pg 11				
29. Was any evidence uncovered during the QAR that reports failed to contain exculpatory evidence and relevant mitigating information discovered during an administrative investigation?							12/03 QS Qualitative Standards, section C, pg 11				
<b>30.</b> Was any evidence uncovered during the QAR that revealed that exculpatory evidence in a criminal or civil investigation was not brought to the attention of the prosecutor?							12/03 QS Qualitative Standards, section C, pg 11				
<b>31.</b> Are reports free of opinions; personal views; unsupported assessments, conclusions, observations, or recommendations?							12/03 QS Qualitative Standards, section C, pg 12				
<b>32.</b> Are all assessments, conclusions, observations, and recommendations based on available facts?							12/03 QS Qualitative Standards, section C, pg 12				
33. Do reports reflect the guidelines described in the Quality Standards?							12/03 QS Qualitative Standards, section C, pg 11-12				
<b>34.</b> Does the organization report systemic weaknesses identified during an investigation to agency officials?							12/03 QS Qualitative Standards, section C, pg 12				
<b>D. INFORMATION MANAGEMENT-</b> The Standards for information retrieval, cross-referencing, and analysis.	D. INFORMATION MANAGEMENT- The Standards for information management state that investigative data be stored in a manner allowing effective										
<b>35.</b> Does the organization have an organizational component responsible for record maintenance and specific procedures to be performed?							12/03 QS Qualitative Standards, section D, pg 13				

Review Step	N/A	Poli			SE 2 stent ctice	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments
<b>36.</b> Does the organization's information flow reflect an orderly, systematic, and accurate management information system?							12/03 QS Qualitative Standards, section D, pg 13	
<b>37.</b> Does the organization's complaint handling activities reflect an effective system for receiving, processing, and handling complaints accurately cradle-to-grave?							12/03 QS Qualitative Standards, section D, pg 13	
<b>38.</b> Does the organization case initiation process utilize the appropriate level of approving authority to make a determination to initiate an investigation or to pursue another course of action?							12/03 QS Qualitative Standards, section D, pg 13	
<b>39.</b> Does the organization's management information system collect the data needed to assist management in performing its responsibilities, measuring its accomplishments, and responding to external customers?							12/03 QS Qualitative Standards, section D, pg 13-14	
a. Does the organization track workload data as described in the Quality Standards?							12/03 QS Qualitative Standards, section D, pg 13	
b. Does the organization track identification data as described in the Quality Standards?							12/03 QS Qualitative Standards, section D, pg 14	
c. Does the organization track investigative results data as described in the Quality Standards?							12/03 QS Qualitative Standards, section D, pg 14	
<b>40.</b> Is there documentary support for the criminal, civil, administrative, and other accomplishments included in the semi-annual reports? (Sample last four semi-annual reports.)							12/03 QS Qualitative Standards, section D, pg 13	
<b>41.</b> Is all exculpatory and incriminating information contained in the official case file?							12/03 QS Qualitative Standards, section D, pg 14	

# **APPENDIX C-1**

Review Step	N/A	Pol	SE 1 icy/ edure	Consi	stent	Reviewed Agency Policy/Manual Reference	QSI Guideline Reference	Comments
<b>42.</b> Are case files established immediately upon the opening and assignment of an investigation?							12/03 QS Qualitative Standards, section D, pg 14	
<b>43.</b> Do the investigative case files reflect the file management described in the Quality Standards?							12/03 QS Qualitative Standards, section D, pg 14-15	