

# MEMO

## External Peer Review Report

September 13, 2022

The Honorable Peggy Gustafson, Inspector General  
Department of Commerce

This required 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 External Peer Reviews of Inspection and Evaluation Organizations of Federal Offices of Inspector General* (December 2020). The peer review was conducted from April 2022 through August 2022.

The Library of Congress Office of the Inspector General (OIG) assessed the extent to which the Department of Commerce OIG complied with the CIGIE *Quality Standards for Inspection and Evaluation*, January 2012 (Blue Book). This assessment included a review of the Department of Commerce OIG's internal policies and procedures, *OAE Policy Manual* dated August 2021 through December 2021, implementing the Blue Book standards. It also included a review of selected inspection and evaluation reports issued between April 1, 2019, and March 31, 2022, to determine whether the reports complied with the Blue Book standards and the Department of Commerce OIG's internal policies and procedures.

### Overall Conclusion

The Library of Congress OIG determined that the Department of Commerce OIG's policies and procedures generally were consistent with the Blue Book standards addressed in the external peer review. Of the three reports reviewed, all generally complied with the Blue Book standards.

We issued a Letter of Comment dated September 13, 2022, that describes a finding that was not considered to significantly impact compliance with a Blue Book standard.

The Department of Commerce OIG management officials provided a response to our Peer Review Report (Enclosure 2) in which they agreed with our overall conclusion.

Sincerely,

A handwritten signature in black ink that reads "Kimberly A. Byrd". The signature is written in a cursive style with a large initial 'K' and a distinct 'A'.

Kimberly A. Byrd, Inspector General

Enclosures

## **ENCLOSURE 1: Scope and Methodology**

The Library of Congress OIG selected the following three reports for review. Our selection was based on peer review guidance for sample selection for small reviewed organizations as well as the sample selection from the prior peer review performed in 2019.

Our sample selection included two reports performed internally by Department of Commerce OIG staff. We also reviewed monitoring files for a contracted I&E engagement to determine whether the Department of Commerce OIG issued and implemented policies and procedures for overseeing and monitoring the contractor's work to ensure compliance with the covered Blue Book standards and contractual requirements.

### **Reviewed I&E Engagements Performed by the Department of Commerce OIG**

Report No.	Report Date	Report Title
OIG-21-032-I	8/5/2021	NIST Was Effective in Implementing the Requirements for Awarding Funds Under the CARES Act
OIG-22-014-I	12/16/2021	The Department Must Improve Processes for Addressing and Managing H Referrals

### **Reviewed Monitoring Files of Department of Commerce OIG for Contracted I&E Engagement**

Report No.	Report Date	Report Title
OIG-22-010-I	12/2/2021	USPTO Has Opportunities to Improve its Patent Examination Process and to Advance Patent Decision-Making

Due to the COVID-19 pandemic, we did not visit any Department of Commerce OIG offices. All work including meetings was performed remotely. The peer review was conducted from April 2022 through August 2022.

**ENCLOSURE 2: Reviewed Organization Comments to Draft Peer Review Report**



September 8, 2022

Ms. Kimberly Byrd  
Inspector General  
Library of Congress  
101 Independence Ave S.E.  
Washington, DC 20540

Dear Inspector General Byrd:

Thank you for the opportunity to respond to the draft letter of comment related to your external peer review of inspections and evaluations conducted by our Office of Audit and Evaluation (OAE). We appreciate your independent review of our office's meeting seven standards required by *Quality Standards for Inspection and Evaluation* (Blue Book, January 2012), including quality control; planning; data collections and analysis; evidence; records maintenance; reporting; and followup over inspections and evaluations. We also appreciate your conclusion that our policies and procedures generally were consistent with the Blue Book standards addressed in the external peer review for the period April 1, 2019, to March 31, 2022.

Enclosed is our response to the specific peer review finding included in the draft letter of comment. We concur with the finding and recommendation and plan to implement corrective action by November 1, 2022.

Please express my appreciation to your staff for their time, dedication, and professionalism in conducting this peer review. Your recommendations will serve to strengthen our system of inspection and evaluation quality control.

If you have any questions, please contact me by email at [pgustafson@oig.doc.gov](mailto:pgustafson@oig.doc.gov) or have your staff contact Mark Zabarsky, Principal Assistant Inspector General, Office of Audit and Evaluation, at [mzabarsky@oig.doc.gov](mailto:mzabarsky@oig.doc.gov).

Sincerely,

A handwritten signature in cursive script that reads "Peggy E. Gustafson".

Peggy E. Gustafson  
Inspector General

Enclosure

## Enclosure

### U.S. Department of Commerce OIG OAE Response to Letter of Comment

**Finding:** Quality Control – Supervision. The team found delays in supervisory reviews of two work papers supporting conclusions in the report.

**Recommendation:** Department of Commerce OIG management should confirm supervisory review through electronic sign-off has occurred prior to issuance of the final report for all project documentation, especially those that support conclusions in the report.

**Response:** We agree with the finding and concur with the recommendation. We will modify our *OAE Policy Manual* quality control checklists to confirm division director certification of project documentation, including verification of supervisory review through electronic sign-off of documents that support conclusions in the report. We will modify the following:

- ***Standards and Quality Control (SQC) Limited Quality Review Checklist,***<sup>1</sup>
- ***OAE Report Writing Checklist,*** and
- ***SQC Checklist for OAE Independent Referencing Review.***

We anticipate completing these actions by November 1, 2022.

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<sup>1</sup> Limited quality reviews are performed before the Go/No-Go and Pre-Draft meetings.