

**REPORT ON THE QUALITY ASSESSMENT REVIEW OF THE
INVESTIGATIVE OPERATION OF THE SPECIAL INSPECTOR GENERAL
FOR AFGHANISTAN RECONSTRUCTION**



Conducted in Arlington, Virginia

By

The U.S. Office of Personnel Management

Office of the Inspector General

1900 E Street NW, Room 6400

Washington, DC 20415

**Deputy Inspector General Performing the Duties of the
Inspector General Norbert E. Vint**

Assistant Special Agent in Charge Amy Parker, Team Leader

Assistant Special Agent in Charge Paul Kimball

Senior Special Agent Jimmy Young

Special Agent Derek Holt

March 10, 2020

TABLE OF CONTENTS

**Section 1 – Report on the External Quality Assessment Review, Complaint Rating
Attachment A – Listing of Sampled Closed Investigative Case Files
Attachment B – Listing of Visited Field Offices**

Section 2 – Letter of Observations

Attachment A: Review of Closed Investigative Files

<u>Case File Number</u>	<u>Case Closing Date</u>
0103-12-BAF-5-0044	5/10/2019
0437-11-KAF-1-0098	7/25/2019
0010-10-WFO-1-0038	12/4/2019
0013-09-KBL-3-0007	5/9/2019
0120-13-MZS-3-0068	2/11/2019
0324-13-WFO-3-0106	5/22/2019
0357-14-WFO-3-0107	12/10/2019
0158-16-KBL-9-0061	10/12/2019
0207-16-KBL-3-0031	10/12/2019
0235-16-KBL-5-0029	10/12/2019
0333-16-KBL-9-0056	10/12/2019
0416-16-KBL-6-0060	10/2/2019
0463-16-BAF-3-0049	3/27/2019
0096-17-BAF-1-0009	10/12/2019
0097-17-BAF-1-0021	10/12/2019
0134-17-BAF-1-0017	10/2/2019
0149-17-WFO-1-0012	7/16/2019
0496-17-WFO-3-0041	2/6/2019
0527-17-KBL-3-0045	10/2/2019
0068-19-BAF-1-0010	7/21/2019

Attachment B: Listing of Visited Field Offices

**Location: 1550 Crystal Drive, Suite 1301
Arlington, VA 22202**

Number of Personnel Interviewed: 10



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Office of the
Inspector
General

March 10, 2020

The Honorable John F. Sopko
Inspector General
Special Inspector General for Afghanistan Reconstruction
2530 Crystal Drive
Arlington, VA 22202

Subject: Report on the Qualitative Assessment Review of the Investigative Operations of the Special Inspector General for Afghanistan Reconstruction

Dear Inspector General Sopko:

The U.S. Office of Personnel Management Office of the Inspector General Peer Review team reviewed the system of internal safeguards and management procedures for the investigative operations of the Special Inspector General for Afghanistan Reconstruction (SIGAR) in effect for the yearlong period ended December 31, 2019. Our review was conducted in conformity with the Quality Standards for Investigations and the Qualitative Assessment Review Guidelines established by the Council of the Inspectors General on Integrity and Efficiency.

We reviewed SIGAR's compliance with its system of internal policies and procedures to the extent we considered appropriate. The review was conducted at the headquarters office in Arlington, Virginia. Additionally, we sampled 20 case files of investigations closed during the previous 12-month period.

In performing our review, we also considered the Attorney General's Guidelines for Office of Inspectors General with Statutory Law Enforcement Authority, as well as Section 6(e) of the Inspector General Act of 1978, as amended (the IG Act). Those documents authorize law enforcement powers for eligible personnel of each of the various Offices of Inspectors General. Law enforcement powers may be exercised only for activities authorized by the IG Act, other statutes, or as expressly authorized by the Attorney General.

In our opinion, SIGAR's system of internal safeguards and management procedures for the investigative function in effect for the year ending December 31, 2019, is in compliance with the quality standards established by the CIGIE and the other applicable guidelines and statutes cited above. These safeguards and procedures provide reasonable assurance of SIGAR conforming with professional standards in the planning, execution and reporting of its investigations and in the use of law enforcement powers.

If you have questions, please contact me at (202) 606-1200. You or someone from your staff may also contact Mr. Drew M. Grimm, Assistant Inspector General for Investigations, at (202) 606-4730 or Ms. Amy Parker, Assistant Special Agent in Charge, at (813) 298-2426.

Sincerely,

Norbert E. Vint
Deputy Inspector General
Performing the Duties of the
Inspector General



Office of the
Inspector General

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

March 10, 2020

The Honorable John F. Sopko
Inspector General
Special Inspector General for Afghanistan Reconstruction
2530 Crystal Drive
Arlington, VA 22202

Subject: Letter of Observations following the Report on the Qualitative Assessment Review of the Investigative Operations of the Office of the Special Inspector General for Afghanistan Reconstruction

Dear Inspector General Sopko:

This is a supplement to our Report on the Qualitative Assessment Review of the Investigative Operations of the Office of the Inspector General for the Special Inspector General for Afghanistan Reconstruction (SIGAR), conducted in February 2020.

In addition to reporting a rating of compliant, the peer review team identified four best practices or similar notable positive attributes of your investigative operations. Specifically, the review team identified the following best practices:

- SIGAR's Investigative Manual is well written, thorough, and easy to understand. Each chapter contains links to all necessary forms referenced within the chapter, which improves the manual's function as a resource. In particular, Chapter 22, "Investigative Analyst Operating Procedures" provides guidance for analysts and specifically recognizes the significance of the analysts' work to the investigative process. All of the analysts interviewed by the U.S. Office of Personnel Management (OPM) Office of the Inspector General (OIG) Peer Review Team voiced appreciation for this chapter and stated that they felt it validated their work.
- The Pre-Closing and Case Transfer Checklist is a tremendous quality control measure that ensures all investigative activity is recorded with supporting documentation in the Investigative Case Management System prior to case closure or transfer. The form requires that the case agent and supervisor sign off on all listed review items and allows for comments when necessary or if an item is missing. The primary case agent is required to sign and upload the completed Pre-Closing and Case Transfer Checklist into the Investigative Case Management System prior to submitting a case for closure or

transfer. All closed cases reviewed by the OPM OIG Peer Review Team contained a copy of the Pre-Closing and Case Transfer Checklist. The OPM OIG Peer Review Team found that the checklist ensures agent accountability in uploading all investigative supporting documentation (such as interview write-ups, data analyses, and court documentation) to support investigative findings prior to submitting the case for closure or transfer. The supervisor serves as a secondary reviewer in assessing compliance with each review item and ensuring that the electronic case file contains all necessary case entries and documentation.

- The Email Log section within the Investigative Case Management System is an effective way to store and locate case-specific emails. The Federal Records Act (Title 44 United States Code Section 3301) and Title 36 Code of Federal Regulations Section 1234.2 requires retention of emails that contain substantive case-related information. The Email Log satisfies this mandate and allows for easy access to case-specific emails without having to search throughout multiple case-activity entries within an electronic case file. The Email Log ensures that case emails are located in one central location and are available for review if needed by prosecutors as potential discovery material or for other purposes.
- SIGAR's control measures concerning grand jury material and evidence were identified as a "Best Practice" during a previous Peer Review. We have identified them as a "Best Practice" again. SIGAR secures all grand jury material and evidence within a room with an entry alarm. Entry into the secure room requires passing through two secure doors using various door lock combinations. The grand jury material is secured in a locked file cabinet and away from the evidence. The evidence and grand jury logs are maintained in separate logbooks, both with thorough accounting of all materials. All necessary grand jury materials and evidence inventories were accounted for and properly documented.

In addition to reporting a rating of compliant, the peer review team identified three areas for improvement or increased efficiency or effectiveness:

Observation #1: Noting Firearm Used to Qualify

According to SIGAR policy, "The standard agency-issued handgun is a semiautomatic pistol. An agent may carry one personally owned handgun when specifically authorized in writing by the AIG-I." Although the SIGAR Operations Officer maintains meticulous documentation of all firearm qualification records, the qualification records do not note whether an agent qualified using an agency-issued handgun or an authorized personally owned handgun. We recommend noting which firearm was used to qualify directly on the qualification paperwork.

We note that immediately following the exit briefing with SIGAR, the OPM OIG Peer Review team was notified that SIGAR's Operation's Officer implemented OPM OIG's suggestion and updated the qualification paperwork to record the weapon used to qualify.

Observation #2: Handwritten Documentation

SIGAR maintains a handwritten evidence log and a handwritten inventory log; it also does not currently maintain an electronic copy of the firearm qualification records. The OPM OIG Peer Review Team recommends SIGAR consider maintaining an additional electronic version of current handwritten paperwork.

Handwritten records are susceptible to damage and destruction, leading to the loss of the document. Handwritten records are also not lockable, which can lead to questions of editing and originality. The sharing of handwritten records is more difficult and poses risk of damage or loss to the document. Electronic records can be locked for editing and are not at risk of damage from environmental factors. The sharing of electronic records is efficient and there is no data deterioration concern.

Our recommendation is not that SIGAR transition to a completely electronic record environment for their current handwritten records. Instead, we recommend that SIGAR maintain an additional electronic copy of handwritten records. We recognize that expending upfront costs may be prohibitive; however, something as simple as saving a scanned copy of the records can help protect the handwritten documents from the risks listed above.

Observation #3: Case Milestones

We recommend that SIGAR consider bolding or differentiating case milestones and benchmarks from other case entries in the Investigative Case Management System. The Quality Standards and AG Guidelines require that certain benchmarks be met and documented in the development of a case. These include initial consultations with prosecutors, FBI notifications, and periodic supervisory reviews. Although the closed case file review did not find any instances where the case file did not contain the proper documentation of an event, bolding or differentiating these milestones from other entries would assist in easily identifying case benchmarks within the Investigative Case Management System.

We hope you find the review team's suggestions helpful. We note that implementation of the suggestions is done at your discretion and will not be tracked or monitored by the review team.

If you have questions, please contact me at (202) 606-1200. You or someone from your staff may also contact Mr. Drew M. Grimm, Assistant Inspector General for Investigations, at (202) 606-4730, or Ms. Amy Parker, Assistant Special Agent-in-Charge, at (813) 298-2426.

Sincerely,

Norbert E. Vint
Deputy Inspector General
Performing the Duties of the
Inspector General