



DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF INSPECTOR GENERAL



June 25, 2020

The Honorable Michael J. Missal
Inspector General
Department of Veterans Affairs
801 I Street, NW
Washington, DC 20001

Dear Inspector General Missal:

SUBJECT: The Department of Health and Human Services (HHS), Office of Inspector General (OIG), final report *Department of Veterans Affairs Inspection and Evaluation External Peer Review Report*, OEI-09-20-00270.

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 Peer Reviews of Inspection and Evaluation Organizations of Federal Offices of Inspector General*. The peer review was conducted from February 4, 2020, through May 2020. The CIGIE External Peer Review Team (Review Team) consisted of experienced OIG inspection and evaluation professionals from the Department of Health and Human Services, the Department of Housing and Urban Development, the Department of Interior, and the Small Business Administration.

The Review Team conducted an external peer review of two offices within the Department of Veterans Affairs OIG: the Office of Audits and Evaluations, and the Office of Healthcare Inspections (collectively VA-OIG). The Review Team assessed the extent to which VA-OIG met seven of the Quality Standards for Inspection and Evaluation (CIGIE standards), specifically: Quality Control; Planning; Data Collections and Analysis; Evidence; Records Maintenance; Reporting; and Followup. This assessment included an examination of VA-OIG's internal policies and procedures for implementing the seven covered CIGIE standards. The assessment also included a review of four, selected inspection and evaluation reports issued between January 2019 and December 2019 to determine whether the reports complied with the covered CIGIE standards and VA-OIG's internal policies and procedures.

The Review Team determined that VA-OIG's internal policies and procedures addressed the seven covered CIGIE standards, and that each of the four reviewed reports complied with CIGIE standards and VA-OIG's internal policies and procedures.

The Review Team also observed that VA-OIG’s approach for conducting independent reference reviews (IRRs) appears to be an effective practice that may be of benefit to others in the inspection and evaluation community. As part of quality control, each office within VA-OIG has a division with specialized quality assurance staff who conduct IRRs of VA-OIG reports.

A VA-OIG official described several benefits associated with this centralized approach to conducting IRRs. For example, assigning IRRs to specialized staff has helped VA-OIG achieve greater consistency in its quality assurance processes relative to when many different staff from across the organization conducted IRRs. The centralized approach has also led to fewer work paper deficiencies and corrections over time, as specialized staff provided guidance to project teams on preparing for centralized IRRs. The approach has also reduced the time needed for conducting IRRs for certain types of projects that are repetitive because the specialized staff have become more efficient in conducting IRRs for these project types. Additionally, the VA-OIG official explained that project staff seem to like the approach because “it is one less job for them to perform.”

There are no recommendations associated with this external peer review.

We have included a Letter of Comment (Enclosure 1) that sets forth the background and methodology for this external peer review. We also included VA-OIG comments in the Agency Comments section (Enclosure 2).

Sincerely,

**CHRISTI
GRIMM**

Christi A. Grimm
Principal Deputy Inspector General

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Enclosures



Enclosure 1: Department of Veterans Affairs Inspection and Evaluation External Peer Review

Background and Methodology

A Council of the Inspectors General on Integrity and Efficiency (CIGIE) External Peer Review Team (Review Team) consisting of experienced inspection and evaluation professionals from the Offices of Inspectors General (OIG) at the Department of Health and Human Services, the Department of Housing and Urban Development, the Department of Interior, and the Small Business Administration conducted a CIGIE-required external peer review of two offices within the Department of Veterans Affairs OIG: the Office of Audits and Evaluations (OAE) and the Office of Healthcare Inspections (OHI). We collectively refer to these offices as VA-OIG.

The external peer review was conducted in accordance with the CIGIE Inspection and Evaluation Committee guidance as contained in the *CIGIE Guide for Conducting Peer Reviews of Inspection and Evaluation Organizations of Federal Offices of Inspector General* (CIGIE Peer Review Guide). The review was conducted from February 4, 2020, through May 2020. The Review Team assessed VA-OIG's internal policies and procedures and four reports issued during calendar year 2019.

The Review Team assessed the extent to which VA-OIG met seven of the Quality Standards for Inspection and Evaluation (CIGIE standards), specifically: Quality Control; Planning; Data Collection and Analysis; Evidence; Records Maintenance; Reporting; and Followup.

This assessment included an examination of VA-OIG's internal policies and procedures and related documents implementing the seven covered CIGIE standards. VA-OIG staff provided policies and procedures and related documents to the Review Team during the months of January and February 2020. The Review Team examined the following information:

- CIGIE's *Quality Standards for Inspection and Evaluation*, January 2012
- VA-OIG's internal policies and procedures:
 - *Office of Audits and Evaluations Policy Handbook*, July 2019
 - *OHI Handbook*, January 2019

- Other VA-OIG documentation:
 - Twenty-four additional documents referenced by VA-OIG's internal policies and procedures that describe the activities and documentation that are to be completed to address and implement the seven covered CIGIE standards.

In accordance with the CIGIE Peer Review Guide, the assessment also included a review of four inspection and evaluation reports issued during calendar year 2019 to determine whether the reports and supporting documentation complied with the seven covered CIGIE standards and VA-OIG's internal policies and procedures. We randomly selected three of the four reports, one from each of the three main lines of work product that VA-OIG conducted under the CIGIE standards: OHI comprehensive health care inspections, OHI hotline inspections, and OEA reviews. We purposely selected the remaining report that VA-OIG suggested and that the Review Team judged beneficial to include because it was a second OAE report. Thus, 2 reports were among 81 issued by the OHI, and the other 2 were among 21 issued by the OAE. The Review Team assessed the following VA-OIG reports:

1. *Comprehensive Healthcare Inspection of the El Paso VA Health Care System Texas*, November 26, 2019;
2. *Orthopedic Surgery Department and Other Concerns at the Carl T. Hayden VA Medical Center, Phoenix, Arizona*, May 7, 2019;
3. *Inadequate Oversight of Contracted Disability Exam Cancellation*, June 10, 2019; and
4. *Decision Ready Claims Program Hindered by Ineffective Planning*, May 21, 2019.

As necessary, the Review Team contacted VA-OIG officials to ask for clarification on its policies, procedures, and operations. In addition, the Review Team briefed the VA-OIG officials about the preliminary results of the review prior to holding an exit conference.

AGENCY COMMENTS

Enclosure 2: Comments on the Veterans Affairs Inspection and Evaluation External Peer Review



DEPARTMENT OF VETERANS AFFAIRS
INSPECTOR GENERAL
WASHINGTON, DC 20420



June 10, 2020

Christi A. Grimm
Principal Deputy Inspector General
Office of Inspector General
Department of Health and Human Services
330 Independence Avenue, SW
Washington, DC 20201

Dear Ms. Grimm:

Thank you for the opportunity to comment on the draft Council of the Inspectors General on Integrity and Efficiency (CIGIE) inspections and evaluations external peer review of the Department of Veterans Affairs (VA), Office of Inspector General (OIG), sent to us by your office on June 9, 2020. We are pleased that the review team made no findings and noted the VA OIG's independent reference review process as a best practice. We are also pleased that the review determined the quality control function was appropriately designed and in compliance with the quality standards established by CIGIE.

We wish to express our sincere appreciation for the professionalism and thoroughness the team demonstrated while conducting their review. If you have any questions, please contact Roxanna Osegueda, Quality Improvement Director, at Roxanna.osegueda@va.gov or (404) 405-9355.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Missal".

MICHAEL J. MISSAL