

**Assessment of Compliance with the CIGIE
Quality Standards for Investigations**

PURPOSE. The *Quality Standards for Investigation* (QSI) contain three general standards (Qualifications, Independence, and Due Professional Care) and four qualitative standards (Planning, Execution, Reporting, and Information Management). 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 CIGIE 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 reviewed agency will complete the "Reviewed Agency Policy/Manual Reference" column and provide this appendix to the review team prior to the onsite review. In instances where multiple OIG components will be reviewed for compliance with the QSI, *and the components have different policy manuals or handbooks*, a separate C-1 should be completed for each component. The reviewed agency will select "N/A" when a section is not applicable to the respective agency. The review team should complete the Review Step 1 column prior to conducting the onsite to compare the agency policy with the Attorney General requirements. The review team should complete the Review Step 2 column while onsite and after the onsite review is conducted as necessary. 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. The "Comments" field may be used by the reviewed or reviewing agency for miscellaneous notes or explanations (denote who made entry).

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
I. 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.								

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
a. Do all newly hired investigators possess a degree from a four-year college or have grade appropriate substitute experience?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards A. pg 2	
<p>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.</p>								
a. Has a character suitability review been conducted for all new hires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS, General Standards, section A, pg 2	
<p>3. Physical Capabilities – The Standards state that each investigative organization should develop job-related physical requirements in accordance with current statutes, regulations, and agency policy to enable investigators to discharge their duties adequately, while promoting personal well-being.</p>								
a. Has the organization developed job-related physical requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, section A, pg 2	
<p>4. Age – The standards state that consideration must be given to minimum and maximum age requirements in accordance with applicable statutes and</p>								

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			

regulations.								
a. Has the organization established minimum and maximum age requirements?	<input type="checkbox"/>		12/03 QS General Standards, section A pg 3					
<p>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 <i>Independence and Due Professional Care</i> 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.</p>								

<p>5. Personal Impairments – The Standards state that an organization should ensure that it and its investigators are free from personal impairments with regard to each specific individual under investigation. Peer Review teams should examine the agency’s policies intended to thwart personal impairments? Does the organization ensure that it and its investigators:</p>								
a. Are free from official, professional, personal or financial relationships that could affect their investigative judgment?	<input type="checkbox"/>		12/03 QS General Standards, section B pg 5-6					
b. Are free from preconceived opinions regarding its investigation?	<input type="checkbox"/>		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?	<input type="checkbox"/>		12/03 QS General Standards, section B pg 5					

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
d. Are free from biases, including those created by political or social convictions regarding its investigation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, section B pg 5	
e. Are free from conflicting financial interests regarding the investigation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, section B pg 5	
6. External Impairments – The Standards state that an organization should ensure that it and its investigators are free from impairments external to OIG that would adversely affect the conduct of independent and objective investigations and the production of factual reports. Peer Review teams should examine the agency’s policies intended to thwart external impairments and report on any instances of same discovered during the peer review. Does the organization ensure:								
a. No interference in the assignment of cases or investigative personnel.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards Section B, pg 6	
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards Section B, pg 6	
d. No denial of access to sources of information, including documents and records.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards	

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
							Section B, pg 6	
<p>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.</p>								
a. Is the investigating organization free of organizational impairments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards Section B, pg 6	
<p>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.</p>								
8. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, Section C, pg 7	
10. Are the methods and techniques used in investigations appropriate for the circumstances and objectives?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, Section C, pg 7	

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
11. Are investigations conducted in a fair and impartial manner and with the perseverance necessary to determine the facts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, Section C, pg 7 5CFR 735 "Employee Responsibilities and Conduct". 5CFR 2635 "Standards of Ethical Conduct".	
14. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, section A, pg 2	
15. Does the organization require timely completion and reporting of investigations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, Section C, pg 7	

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
16. Are the investigative report findings and accomplishments supported by adequate, accurate, and complete documentation in the case file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, Section C, pg 7	
17. Does the organization properly address warnings including Miranda, Garrity and Kalkines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section B, pg 10-11	
18. Does the organization properly receive, identify, store, and preserve evidence?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, Section D, pg 14.	
19. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		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.]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS General Standards, Section C, pg 6 and 7.	

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			

II. QUALITATIVE STANDARDS								
A. PLANNING – The Standards provide that the investigative organization should establish organizational and case specific priorities and develop objectives to ensure that individual case tasks are performed efficiently and effectively.								
21. Organization Planning								
a. Does the investigative organization establish organizational and case specific priorities and develop objectives to ensure that individual case tasks are performed efficiently and effectively?	<input type="checkbox"/>		12/03 QS Qualitative Standards, section A, pg 8					
b. Does the investigative organization require supervisory approval for investigative initiation?	<input type="checkbox"/>		AG 2008 FBI Operations Memo Sections II & (II)(B)(2) Page 18					
22. Individual Case Planning								
a. On receipt of an allegation, does the organization evaluate the allegation for possible investigative effort, referral or closure?	<input type="checkbox"/>		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?	<input type="checkbox"/>		12/03 QS Qualitative Standards, section A, pg 9					

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			

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?	<input type="checkbox"/>		12/03 QS Qualitative Standards, section B, pg 10					
24. Are two investigators present when conducting potentially hazardous or compromising interviews?	<input type="checkbox"/>		12/03 QS Qualitative Standards, section B, pg 10					
25. Are requests for witness confidentiality considered and properly documented?	<input type="checkbox"/>		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?	<input type="checkbox"/>		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?	<input type="checkbox"/>		12/03 QS Qualitative Standards, section B, pg 10-11					
28. 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?	<input type="checkbox"/>		12/03 QS Qualitative Standards, section B, pg 11					

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
29. Was any evidence uncovered during the QAR that reports failed to contain exculpatory evidence and relevant mitigating information discovered during an administrative investigation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section C, pg 11	
30. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section C, pg 11	
31. Are reports free of opinions, personal views, unsupported assessments, conclusions, observations, or recommendations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section C, pg 12	
32. Are all assessments, conclusions, observations, and recommendations based on available facts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section C, pg 12	
33. Do reports reflect the guidelines described in the Quality Standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section C, pg 11-12	
34. Does the organization report systemic weaknesses identified during an investigation to agency officials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section C, pg 12	
D. INFORMATION MANAGEMENT- The Standards for information management state that investigative data be stored in a manner allowing effective retrieval, cross-referencing, and analysis.								

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
35. Does the organization have an organizational component responsible for record maintenance and specific procedures to be performed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 13	
36. Does the organization's information flow reflect an orderly, systematic, and accurate management information system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 13	
37. Does the organization's complaint handling activities reflect an effective system for receiving, processing, and handling complaints accurately cradle-to-grave?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 13	
38. Does the organization's 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 13	
39. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 13-14	
a. Does the organization track workload data as described in the Quality Standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 13	
b. Does the organization track identification data as described in the Quality Standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 14	

Assessment of Compliance with the CIGIE
Quality Standards for Investigations

Review Step	N/A	REVIEW STEP 1 Does Policy/ Procedure Exist?		REVIEW STEP 2 Practice Consistent with Policy/ Procedure?		Reviewed Agency Policy/ Manual Reference	AG Guideline Reference and Page Number	Comments
		Yes	No	Yes	No			
c. Does the organization track investigative results data as described in the Quality Standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 14	
40. Is there documentary support for the criminal, civil, administrative, and other accomplishments included in the semi-annual reports? (Sample last four semi-annual reports.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 13	
41. Is all exculpatory and incriminating information contained in the official case file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 14	
42. Are case files established immediately upon the opening and assignment of an investigation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 14	
43. Do the investigative case files reflect the file management described in the Quality Standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		12/03 QS Qualitative Standards, section D, pg 14-15	