



**COUNCIL OF THE INSPECTORS GENERAL  
ON INTEGRITY AND EFFICIENCY**  
**INTEGRITY COMMITTEE**

January 3, 2024

The President  
The White House  
Washington, DC 20500-0000

Dear Mr. President:

The Inspector General Act of 1978, as amended, requires the Council of the Inspectors General on Integrity and Efficiency (CIGIE) to submit to the President and the Congress a report on the activities of the CIGIE Integrity Committee (IC) during the immediately preceding 6-month period. 5 U.S.C. § 424(d)(9). Enclosed is the report of the IC Chairperson, summarizing the IC activities for April 1, 2023 through September 30, 2023. The report provides information on the number, status, and disposition of complaints received by the IC during this period.

Thank you for your continued support for the work of the Inspector General community. Should your staff wish to receive any additional information concerning this report or any other CIGIE activity, please have them contact me or Juan Lara, CIGIE External and Congressional Affairs Specialist, at [juan.lara@cigie.gov](mailto:juan.lara@cigie.gov).

Respectfully,

Mark Lee Greenblatt, Chairperson

Enclosure

cc: The Honorable Jason Miller, Executive Chairperson  
Council of the Inspectors General on Integrity and Efficiency



**COUNCIL OF THE INSPECTORS GENERAL  
ON INTEGRITY AND EFFICIENCY**  
**INTEGRITY COMMITTEE**

January 3, 2024

The Honorable Gary C. Peters  
Chairman, Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
340 Dirksen Senate Office Building  
Washington, DC 20510-6250

The Honorable Rand Paul  
Ranking Member, Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
340 Dirksen Senate Office Building  
Washington, DC 20510-6250

Dear Mr. Chairman and Ranking Member Paul:

The Inspector General Act of 1978, as amended, requires the Council of the Inspectors General on Integrity and Efficiency (CIGIE) to submit to the President and the Congress a report on the activities of the CIGIE Integrity Committee (IC) during the immediately preceding 6-month period. 5 U.S.C. § 424(d)(9). Enclosed is the report of the IC Chairperson, summarizing the IC activities for April 1, 2023 through September 30, 2023. The report provides information on the number, status, and disposition of complaints received by the IC during this period.

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Council of the Inspectors General on Integrity and Efficiency



**COUNCIL OF THE INSPECTORS GENERAL  
ON INTEGRITY AND EFFICIENCY**  
**INTEGRITY COMMITTEE**

January 3, 2024

The Honorable James Comer  
Chairman, Committee on Oversight  
and Accountability  
U.S. House of Representatives  
2157 Rayburn House Office Building  
Washington, DC 20515-6143

The Honorable Jamie Raskin  
Ranking Member, Committee on Oversight and  
Accountability  
U.S. House of Representatives  
2157 Rayburn House Office Building  
Washington, DC 20515-6143

Dear Mr. Chairman and Ranking Member Raskin:

The Inspector General Act of 1978, as amended, requires the Council of the Inspectors General on Integrity and Efficiency (CIGIE) to submit to the President and the Congress a report on the activities of the CIGIE Integrity Committee (IC) during the immediately preceding 6-month period. 5 U.S.C. § 424(d)(9). Enclosed is the report of the IC Chairperson, summarizing the IC activities for April 1, 2023 through September 30, 2023. The report provides information on the number, status, and disposition of complaints received by the IC during this period.

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Respectfully,

Mark Lee Greenblatt, Chairperson

Enclosure

cc: The Honorable Jason Miller, Executive Chairperson  
Council of the Inspectors General on Integrity and Efficiency

# INTEGRITY COMMITTEE SEMIANNUAL REPORT TO CONGRESS AND THE PRESIDENT

April 1, 2023 – September 30, 2023



**COUNCIL OF THE INSPECTORS GENERAL  
ON INTEGRITY AND EFFICIENCY**

**INTEGRITY COMMITTEE**

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### **Message from Chairperson Winters**



It is my privilege to submit this semiannual report highlighting the activities, accomplishments, and challenges of the Council of the Inspectors General on Integrity and Efficiency’s (CIGIE) Integrity Committee (IC) from April 1, 2023, to September 30, 2023.

The IC has continued its core oversight work to ensure senior Office of Inspector General (OIG) officials “perform their duties with integrity and apply the same standards of conduct and accountability to themselves as they apply to the agencies that they audit and investigate.”<sup>1</sup> The IC remains committed to continuing its important mission while working with Congress and other stakeholders to help ensure there is trusted and independent oversight of senior personnel within the IG community.

The attached semiannual report reflects another busy reporting period for the IC and its staff. The IC received 2,448 incoming communications (792 more than the previous reporting period), resulting in 59 cases for the IC’s formal substantive disposition.

During this reporting period, the IC completed three investigations initiated in prior fiscal years and issued its respective findings and recommendations to the appointing official and congressional committees of jurisdiction. As described later in this report, two of the investigations had substantiated findings of wrongdoing; the third did not. The IC completed a total of five investigations in fiscal year 2023.

The IC also continued its ongoing commitment to accountability, transparency, and effectiveness through briefings and educational outreach efforts with congressional staff members and other IC stakeholders. For example, during this reporting period, IC staff conducted the following presentations:

- IC staff provided a briefing on the IC’s findings and recommendations in IC 986, a case involving allegations of procurement wrongdoing, to staff of the Senate Committee on Agriculture, Nutrition, & Forestry, the Senate Committee on Homeland Security and Governmental Affairs, the House Committee on Oversight and Accountability, and the House Committee on Agriculture.
- IC and CIGIE staff addressed a CIGIE-sponsored Whistleblower Protection Coordinator Event in June 2023. The presentation focused on the agency’s responsibility, as required by Section 5204 of the Fiscal Year 2023 National Defense Authorization Act, to ensure that all OIG employees are fully informed about their whistleblower rights and protections. IC staff addressed the availability and responsibility of the IC and the critical role the IC plays in holding Inspectors General (IGs) and senior OIG personnel accountable for misconduct. IC staff also emphasized the importance of OIG personnel

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<sup>1</sup> Committee on Oversight and Government Reform, Improving Government Accountability Act, 110th Cong. (Sept. 27, 2007) (H. Rept. 110-354).

understanding the IC’s jurisdiction and processes. Additionally, IC staff explained the coordination that occurs between the IC, Office of Special Counsel, and Department of Justice in reviewing and responding to allegations of misconduct or reprisal by IGs or senior OIG personnel. Approximately 330 people attended this event.

- In September 2023, CIGIE sponsored another Whistleblower Education Forum, “OIGs Learning Through Collaboration.” The IC’s presentation discussed the establishment of the IC and the importance of educating internal and external stakeholders on the IC’s policies and procedures. Approximately 168 people attended the event.
- IC educational briefings are also a critical part of CIGIE’s training package for new IGs and Acting IGs. Six new or newly acting IGs attended this training during this reporting period. As a part of the training, IC staff discuss the composition of the IC, its jurisdiction and processes, and the critical role it plays in holding senior OIG personnel accountable. IC staff also explain an IG’s responsibility for reporting allegations to the IC and the IC’s expectations regarding cooperation and full, unfettered access to OIG documents and witnesses during an IC investigation.

Finally, our report identifies IC challenges, which include improving the timeliness of the IC’s investigative products. Since taking over IC functions in 2016, CIGIE has taken steps to improve IC operations, such as adding to its IC professional staff. At the end of this reporting period, three CIGIE employees (two attorneys and a program manager) now support the IC full time, which has markedly improved the IC’s internal processes. Nevertheless, the IC continues to experience challenges in its ability to meet the Inspector General Act of 1978 (IG Act) investigative deadlines, which is further described in our report.

The IC trusts that this semiannual report will be helpful and provide further insight into its activities, accomplishments, and challenges. For more information regarding the IC’s historical records, reports of investigations, and up-to-date reporting regarding its activities, please visit <https://www.ignet.gov/cigie/committees/integrity-committee>.



Kevin H. Winters  
Chairperson

**Council of the Inspectors General  
on Integrity and Efficiency Integrity Committee  
Semiannual Report  
April 1, 2023-September 30, 2023**

**Statutory Authority and Mission**

The mission of the Council of the Inspectors General on Integrity and Efficiency’s (CIGIE) [Integrity Committee](#) (IC) derives from the Inspector General Act of 1978 (IG Act), specifically as codified at 5 U.S.C. § 424(d). In pertinent part, the IC is to receive, review, and refer for investigation allegations of wrongdoing made against an Inspector General (IG), certain designated senior members of an Office of Inspector General (OIG), and the Special Counsel and Deputy Special Counsel of the U.S. Office of Special Counsel (OSC). In addition, the Legislative Branch Inspectors General Independence Act of 2019 requires the IC to review allegations of misconduct by an agent or special agent in a Legislative Branch OIG.

**Committee Membership and Professional Staff**

IC membership includes four IGs, a designee from the Office of Government Ethics (OGE), and a designee from the Federal Bureau of Investigation (FBI). The current IC members are:

- [Kevin H. Winters](#), IG, Amtrak (Chairperson)
- [The Honorable Thomas A. Monheim](#), IG of the Intelligence Community (Vice Chairperson)
- [Kimberly A. Howell](#), IG, Corporation for Public Broadcasting
- [The Honorable Gail S. Ennis](#), IG, Social Security Administration
- [Dale A. Christopher](#), Deputy Director for Compliance, OGE
- [Catherine S. Bruno](#), Assistant Director, Office of Integrity and Compliance, FBI

Additionally, [Andrew Katsaros](#), IG, Federal Trade Commission, and [the Honorable Brian Tomney](#), IG, Federal Housing Finance Agency, serve as alternate IC members in the event an IC member is recused from participating in IC matters or is otherwise unavailable and the IC is unable to establish quorum.

The IC is supported by three CIGIE staff members, who report directly to the IC Chairperson, and a Department of Justice (DOJ) legal advisor, currently a senior official of the DOJ Public Integrity Section. As required by operational necessity, additional IC legal support is provided by detailing qualified attorneys from Federal departments and agencies.

**Integrity Committee Policies and Procedures**

The IC operates pursuant to its published [policies and procedures](#) (IC Policies and Procedures), which refers to individuals subject to IC oversight as “Covered Persons.” Upon receipt of a complaint against a Covered Person, IC staff forwards the complaint to the Allegation Review Group, a three-member panel that consists of a designee of the IC, DOJ, and OSC (*see* Enclosure 1). This ensures the equities of each agency are considered prior to referring the matter to the IC for review. The IC members meet every three weeks as an independent deliberative body to review each allegation, using a threshold standard and the current policies and procedures to guide



its actions.<sup>2</sup> The IC continually strives to ensure the fair, consistent, timely, and impartial disposition of allegations. In doing so, the IC only acts on allegations of wrongdoing that involve abuse of authority in the exercise of official duties or while acting under color of office; substantial misconduct, such as gross mismanagement, gross waste of funds, or a substantial violation of law, rule, or regulation; or conduct that undermines the independence or integrity reasonably expected of such persons.<sup>3</sup>

To mitigate the existence or appearance of conflicts of interest, the IC adheres to a policy of transparency and recusal, as appropriate. For example, IC members are automatically recused from participating in matters in which that member or another person in that member's office or agency has personally and substantially participated, and all matters before the IC while the member knows that he or she is under criminal investigation or IC investigation. Additionally, an IC member may be recused from a matter if that member or the IC believes that the member's impartiality would be questioned by a reasonable person with knowledge of the relevant facts.<sup>4</sup> All recusals are noted in the minutes of the meeting at which the recusal was determined.

### **Allegations of Wrongdoing: by Federal Position**

During this reporting period, the IC received 2,448 incoming communications, which were screened to remove duplicates, objectively unreliable information, and complaints determined to be completely outside of the IC's authority. The remaining 59 complainant communications were then forwarded to the Allegation Review Group for review and placed on the IC's meeting agenda. These 59 cases involved 28 different agencies and 68 Covered Persons. Of the allegations referred to the IC, 44% were allegations against IGs, former IGs, and those acting in the capacity as the IG, 20% were against the Deputy IG; 9% were against the Counsel to the IG, 18% were against an Assistant IG, and 9% were against other designated staff (*see* Figure 1).

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<sup>2</sup> The IC considers allegations of wrongdoing against any of the following individuals: an IG; a staff member of an OIG whose position is designated under section 4 of these Policies; the Special Counsel and the Deputy Special Counsel of OSC, but not their staff members; and anyone serving in an Acting or Interim capacity in a position set forth above. At its discretion and consistent with the public interest (including the availability of an effective remedy), the IC may consider wrongdoing alleged to have occurred while an individual served as a Covered Person, even if that individual is no longer a Covered Person or in government service when the IC receives the allegation. IC Policies and Procedures (ICP&P) (2018), section 2.

<sup>3</sup> ICP&P (2018), section 7.A.

<sup>4</sup> ICP&P (2018), section 3.K.

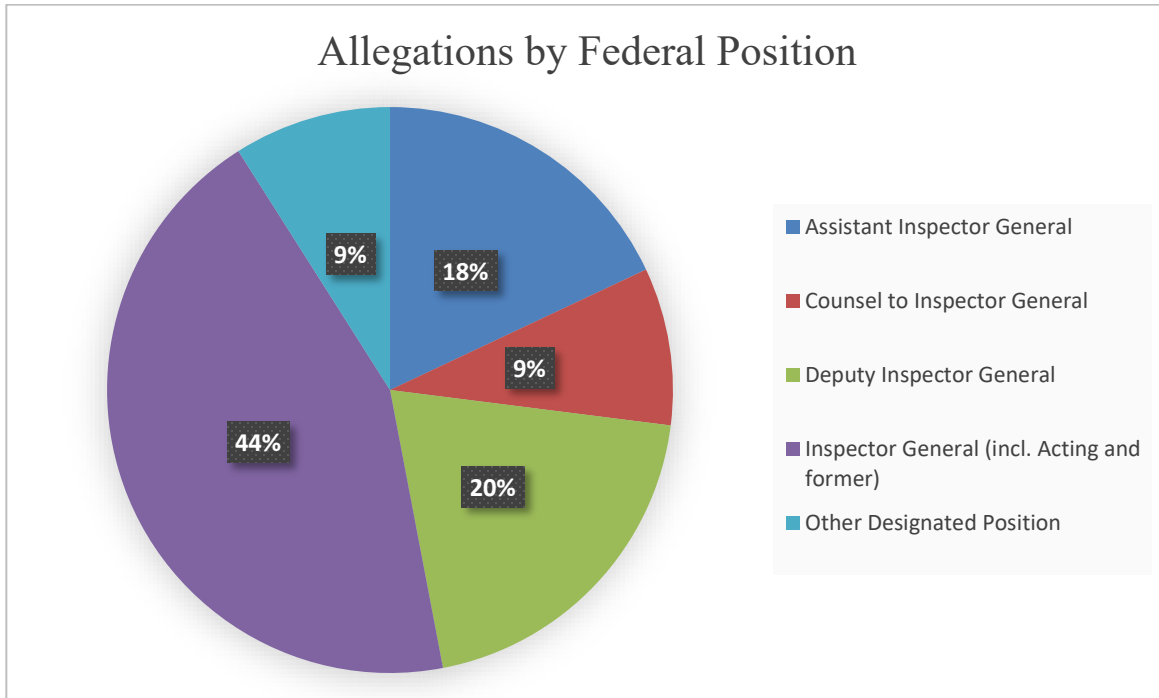


Figure 1. Allegations by Federal Position

**Allegations of Wrongdoing: by Category**

During this reporting period, the IC opened 59 cases for review. On average, each case contained multiple allegations of wrongdoing against one or more Covered Persons. The total number of allegations received by the IC during this reporting period was 108, averaging 479 pages of substantive information for IC review for each meeting, and which are displayed below by category (see Figure 2).

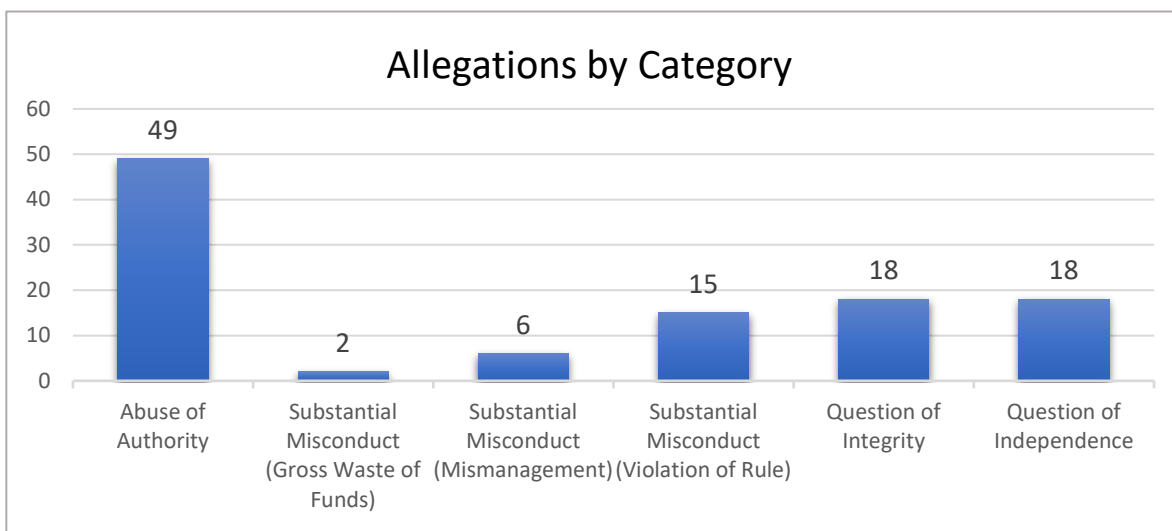


Figure 2. Allegations by Category

**Case Dispositions**

During this reporting period, the IC opened 59 cases, closed 47 cases, and had 12 cases remaining pending IC review (See Enclosure 2). The IC requested additional information from 3

complainants and sought 7 responses from 10 subjects. There were no new referrals to the IC Chairperson for investigation.

Of the 47 cases closed by the IC, 30 cases were closed without external referral because they did not meet the IC's threshold standard for further action (e.g., the allegations did not implicate a Covered Person or wrongdoing was not reasonably raised by the alleged facts). Three cases were closed after the IC requested, received, and reviewed subject responses to the allegations, and 14 cases were referred to other heads of agencies for any action deemed appropriate:<sup>5</sup>

- Six to the Special Counsel of OSC;
- Eight to another agency of jurisdiction;
- No referrals to the CIGIE Chairperson; and
- No referrals to DOJ, including DOJ's criminal division.

The following 12 cases were pending at the end of fiscal year 2023 and will be included in the IC's next semiannual report:

- IC 23-097: The IC received this case on August 11, 2023. The IC requested a response from the subject and granted their request for a 20-day extension to the deadline. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-099: The IC received this case on August 14, 2023. The IC requested a response from the subject and granted their request for a 20-day extension to the deadline. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-100: The IC received this case on August 15, 2023. The IC requested a response from the subject and granted their request for a 20-day extension to the deadline. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-102: The IC received this case on August 21, 2023. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-104: The IC received this case on August 21, 2023. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-106: The IC received this case on August 28, 2023. The IC requested a response from the subject. The matter was reviewed/considered by the IC in November 2023, and will be reported in the IC's next semiannual report.
- IC 23-111: The IC received this case on September 8, 2023. The matter was reviewed/considered by the IC in October 2023 and consolidated with IC 23-104 and will be reported in the IC's next semiannual report.

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<sup>5</sup> To protect whistleblowers' identities, the IC will not refer an allegation to another agency of jurisdiction without the complainant's consent.

- IC 23-114: The IC received this case on September 15, 2023. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-115: The IC received this case on September 19, 2023. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-116: The IC received this case on September 21, 2023. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-117: The IC received this case on September 27, 2023. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.
- IC 23-118: The IC received this case on September 27, 2023. The matter was reviewed/considered by the IC in October 2023, and will be reported in the IC's next semiannual report.

### **Cases that Remain from Previous Reporting Periods**

Two cases remain with the IC from the previous reporting period:

- IC 22-046: The IC received this case on May 12, 2022, and engaged in deconfliction briefings with multiple entities. Additionally, the IC agreed to assist the subject OIG with finding another independent OIG to investigate an allegation that was outside the IC's authority; the IC received additional allegations and decided to consolidate the matters; the IC requested a response from the subjects and granted their request for a 20-day extension to the deadline and, after reviewing the subjects' responses, the IC requested an additional response from the subjects and the subjects again sought extensions. Based on additional allegations that the IC received while the subjects were reviewing the IC's second request for information, the IC supplemented its request for information with a third request. One subject stated they could not provide a complete response to the IC because they were not authorized to do so by their OIG. Therefore, the IC requested that the OIG provide authorization. The IC will evaluate the information it receives to determine next steps.
- IC 23-057: The IC received this case on March 23, 2023. The IC requested a response from the subjects and granted their requests for a 20-day extension to the deadline. The IC reviewed the matter in June 2023 and determined to consolidate the matter with 22-046 above.

### **Investigations Referred to the Chairperson in this Reporting Period**

No new cases were referred to the IC Chairperson for investigation during this reporting period.

### **Investigations Referred to the Chairperson in Previous Reporting Periods**

The IC completed three investigations this reporting period and issued its findings and recommendations to the appointing authority and these committees:

- IC 20-035 Legal Services Corporation (LSC) OIG: the IC found by a preponderance of the evidence that the Assistant Inspector General for Investigations engaged in conduct undermining the integrity reasonably expected of his position when he created the appearance that he used his position for an improper purpose.
- IC 21-027 Library of Congress (LOC) OIG: the IC found by a preponderance of the evidence that the former IG's relationship with a Senior Management LOC Employee wrongfully created the appearance that the independence of the IG (and his office) was compromised.
- IC 22-057 Commodity Futures Trading Commission (CFTC) OIG: the IC determined the allegations against the IG and the Deputy IG were not substantiated.

For more information on these investigations, see Enclosure 3.

The IC had the following seven investigations pending completion at the end of the reporting period:

- IC 20-059: On April 8, 2021, the IC referred this matter to the IC Chairperson for investigation. The Assisting OIG is preparing the draft report of investigation.
- IC 21-019: On April 8, 2021, the IC referred this matter to the IC Chairperson for investigation. The Assisting OIG is preparing the draft report of investigation.
- IC 22-028.044: On July 7, 2022, the IC referred this matter to the IC Chairperson for investigation. The Assisting OIG is preparing the draft report of investigation.
- IC 22-048: On May 26, 2022, the IC referred this matter to the IC Chairperson for investigation. The investigation is ongoing.
- IC 22-063: On August 18, 2022, the IC referred this matter to the IC Chairperson for investigation. The Assisting OIG is preparing the draft report of investigation.
- IC 23-022: On January 5, 2023, the IC referred this matter to the IC Chairperson for investigation. The investigation is ongoing.
- IC 23-039: On February 13, 2023, the IC referred this matter to the IC Chairperson for investigation. The investigation is ongoing.

The IC does not provide substantive information on pending investigations outside of the deconfliction process.

In addition, and pursuant to a new statutory requirement, the IC Chairperson issued a “seven-day” report to an Inspector General on February 27, 2023. The law requires the IC Chairperson to issue such a letter when the Chairperson becomes aware of “particularly serious or flagrant problems, abuses, or deficiencies relating to the administration of programs and operations within that Office of Inspector General for which the Integrity Committee may receive, review,

and refer for investigation allegations of wrongdoing.” The law requires the subject Office of Inspector General to submit a response to the President. The response was submitted to the President on March 3, 2023, and the IC Chairperson provided an update to the President on September 7, 2023.

### **Major Challenges Faced by the IC**

5 U.S.C. § 424(d)(9) requires CIGIE to submit to Congress and the President a report on the activities of the IC during the immediately preceding 6-month period, including a brief description of any difficulty encountered by the IC, such as any attempt to prevent or hinder an investigation; concerns about the integrity or operations at an OIG; and other matters that CIGIE or the IC considers appropriate.

**Investigative timeliness.** One of the IC’s longstanding challenges is meeting the IG Act’s deadlines for processing complaints and issuing investigative reports. The IC takes this obligation very seriously. Nevertheless, factors such as case complexity and available resources impact the time it takes to process complaints and to investigate a matter and produce a report of investigation.

During this reporting period, the IC issued 5 letters notifying Congress of the need to extend the 30-day IC review period and the 150-day IC investigation period reflected in the IG Act.<sup>6</sup> Of the 20 cases that exceeded the IC review period:

- 10 cases exceeded the initial 30-day IC review period due to requests for additional information or because the subject requested an extension in addition to the 20 days given by IC policy to each subject who is asked to respond to the allegations; the classified nature of the material; or a lack of quorum for IC determinations.
- 10 cases exceeded the 150-day IC investigation period due to such factors as the large number of documents reviewed and witnesses interviewed for each case; the investigation uncovered additional allegations of wrongdoing that required further investigation; or there was a lack of cooperation by subjects and others; or the factors listed below.

**Factors impacting timeliness.** Compared to OIGs with an imbedded investigative capability and the ability to prioritize investigative assets, IC operations are dependent on a small staff to coordinate and administer the IC’s workload and rely on the capacity of Assisting OIGs to timely perform the assigned investigations. In addition, IC decision-making is dependent upon the availability of IC members, all of whom have demanding positions external to the IC, to prepare for meetings, make decisions, and track cases.

- **Staffing Limitations.** The IC’s origins date back to 1996, per Executive Order 12993, in which the FBI administered IC operations. In 2016, the Inspector General Empowerment Act shifted IC operations from the FBI to CIGIE, which included administrative responsibilities such as complaint processing, case file management, investigative management, correspondence, external relations, and Freedom of Information Act responsibilities. Since that time, one or two full-time staff fulfilled those duties.
  - CIGIE made IC staffing a priority and hired another full-time attorney; at the end of this reporting period, three CIGIE employees (two attorneys and a program manager) supported the IC full time. The IC also had the support of two temporary

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<sup>6</sup> Each such letter addresses multiple cases.

investigative counsels (on detail from other agencies), but as of the publication of this report, one detailee has returned to their agency and the other detailee was hired by CIGIE full time to support the Office of General Counsel. The IC has identified and selected another temporary investigative counsel and that individual is scheduled to support the IC for one year as of December 31, 2023.

- Coordination Challenges. Under the IG Act, four IGs, from both establishment and non-establishment organizations, coupled with executives from the FBI and OGE, comprise the IC. IC membership responsibilities are in addition to their regular duties, which, for IGs, is oversight over the programs and operations of their respective departments, agencies, or designated federal entities.

While IC meetings and decisions have the benefit of multiple perspectives, the IC decision-making process presents a major coordination challenge, and the unavailability of even one staff member can have a significant impact on the process. So too with the availability of IC members, as the IC must have a quorum to make decisions.

When IC cases are ready for review, IC staff must coordinate the schedules of the six IC members and a DOJ Public Integrity Section attorney to meet and review the incoming complaints and supporting documentation. During these meetings, which generally occur every three weeks, IC members make decisions such as closing a matter; requesting further information from a subject or complainant; and referring a matter to another entity or to the IC Chairperson for investigation. Follow-ups to meetings involve production and approval of correspondence, and separate individual case tracking meetings.

- Investigative Outsourcing and Control. The IC does not have an imbedded investigative capability; rather, it seeks investigative support pursuant to the IG Act from OIGs in the federal IG community (Assisting OIGs). Since the assumption of IC leadership and management responsibilities in 2016, CIGIE has spent \$2,851,192.82 outsourcing IC investigations to Assisting OIGs. This process creates delays for different reasons. For example, finding a non-conflicted OIG of “equivalent size” to the OIG under IC investigation (as required by statute), and who has the operational capacity to assist the IC with an investigation, can take weeks or months, which further impacts the ability of the IC to complete an investigation within the 150 days required by the IG Act.<sup>7</sup>

In addition, an Assisting OIG typically investigates IC matters among other investigative priorities facing the Assisting OIG, which also impacts overall availability or timeliness. The IC has no ability to select an Assisting OIG’s investigative team or adjust the internal priorities of team members. For example, the challenges presented by pandemic relief fraud cases in the IG community continue to present an unprecedented strain on the IG community’s investigative resources and priorities.

- Other Factors Contributing to IC Delay. Over the years, the IC has faced numerous reasons, aside from structure and staffing, that have delayed its operations. These include resistance from subjects or their parent OIG when the IC attempts to review, evaluate, or investigate allegations of wrongdoing. Such activities include non-responsiveness from subjects when the IC requests a response; challenges by a subject or OIG staff ranging from claims that the Assisting OIG and/or the IC has no authority over

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<sup>7</sup> 5 U.S.C § 424(d)(7)(B)(i)(v) and (d)(7)(C)(i).

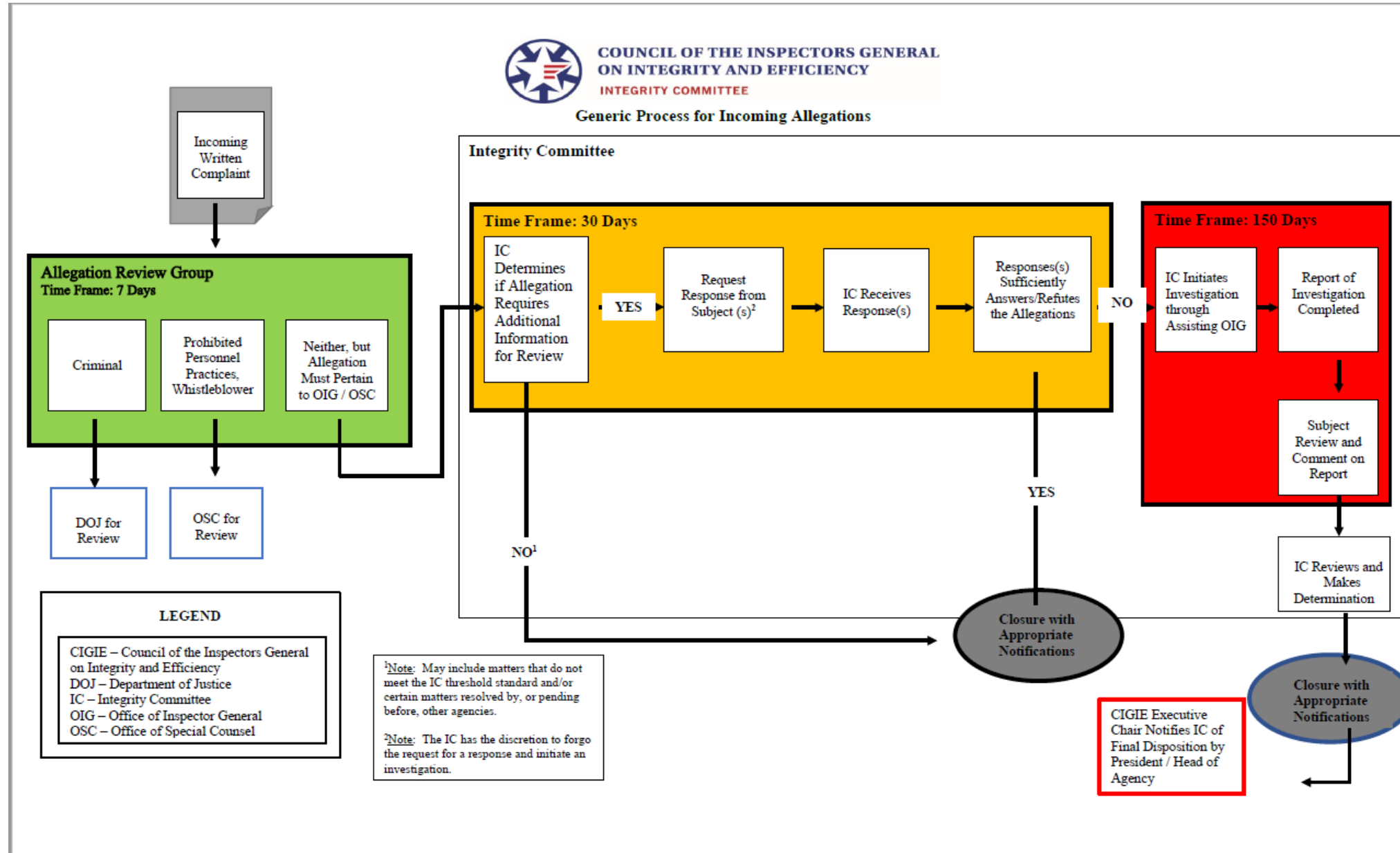
their agency to assertions of privilege or that the information is classified. Subjects have also sought to halt or influence the IC process by seeking relief through the courts; complaints against IC members; and a request for the CIGIE Chairperson to remove the current IC membership. Finally, congressional oversight is a welcome and expected part of the IC oversight process. Nevertheless, congressional engagement (briefings, correspondence, data requests, etc.) has markedly increased over the past years and has had an impact on the prioritization of IC resources.

### **Integrity Committee Contact Information and Resources**

CIGIE and the IC staff maintain a webpage for historical records and up-to-date information regarding the IC and its activities at <https://www.ignet.gov/cigie/committees/integrity-committee>. The webpage also includes information on how to contact the IC, and additional information such as frequently asked questions and guidance on filing a complaint and the opportunity to remain confidential.



**Enclosure 1. Generic Integrity Committee Process for Allegations Received Against Covered Persons**



**Enclosure 2. Disposition Dates for Cases in this Reporting Period.**

Case #	Date Opened / Referred to IC	Date Closed	Case #	Date Opened / Referred to IC	Date Closed
060	4/6/2023	04/14/2023	079	7/3/2023	07/13/2023
061	4/10/2023	05/04/2023	080	7/3/2023	07/13/2023
062	4/11/2023	06/22/2023	081	7/3/2023	07/13/2023
063	4/17/2023	05/04/2023	082	7/4/2023	08/03/2023
064	4/17/2023	06/01/2023	083	7/13/2023	08/03/2023
065	4/21/2023	06/22/2023	084	7/14/2023	08/03/2023
066	5/4/2023	06/01/2023	085	7/14/2023	08/03/2023
067	5/5/2023	07/13/2023	086	7/17/2023	08/03/2023
068	5/12/2023	06/01/2023	087	7/20/2023	08/03/2023
069	5/16/2023	06/01/2023	088	7/25/2023	08/03/2023
070	5/25/2023	06/01/2023	089	7/25/2023	08/03/2023
071	5/25/2023	06/01/2023	090	7/25/2023	08/03/2023
072	5/30/2023	06/22/2023	091	7/26/2023	08/03/2023
073	6/2/2023	06/22/2023	092	8/4/2023	08/24/2023
074	6/7/2023	07/13/2023	093	8/4/2023	08/24/2023
075	6/9/2023	06/22/2023	094	8/7/2023	09/14/2023
076	6/12/2023	08/03/2023	095	8/7/2023	08/24/2023
077	6/14/2023	07/13/2023	096	8/9/2023	08/24/2023
078	6/14/2023	08/03/2023	097	8/11/2023	Pending
			098	8/14/2023	08/24/2023
			099	8/14/2023	Pending
			100	8/15/2023	Pending
			101	8/15/2023	08/24/2023
			102	8/21/2023	Pending
			103	8/21/2023	09/14/2023
			104	8/21/2023	Pending
			105	8/28/2023	09/14/2023
			106	8/28/2023	Pending
			107	8/28/2023	09/14/2023
			108	8/28/2023	09/14/2023
			109	8/29/2023	09/14/2023
			110	8/31/2023	09/14/2023
			111	9/8/2023	Pending
			112	9/12/2023	09/14/2023
			113	9/12/2023	09/14/2023
			114	9/15/2023	Pending
			115	9/19/2023	Pending
			116	9/21/2023	Pending
			117	9/27/2023	Pending
			118	9/27/2023	Pending

### **Enclosure 3. Summaries of Closed Investigations**

#### **IC Case 20-035: Legal Services Corporation (LSC) OIG**

On February 27, 2020, the IC received a complaint alleging Assistant Inspector General for Investigations (AIGI) O'Rourke improperly used his official email and signature block in correspondence with his homeowners association (HOA) during a personal dispute among private parties.

After deliberations, the IC voted to refer the allegations to the IC Vice Chairperson for investigation.<sup>8</sup> The IC Vice Chairperson engaged the U.S. Department of Justice OIG to conduct the investigation on the IC's behalf. After thoroughly reviewing the report of investigation and AIGI O'Rourke's comments, the IC found by a preponderance of the evidence that AIGI O'Rourke engaged in conduct undermining the integrity reasonably expected of his position when he created the appearance that he used his position for an improper purpose.

The IC issued its findings and recommendation to the LSC Chairman on July 18, 2023. On August 23, 2023, in response to the IC's findings and recommendation, the LSC IG issued AIGI O'Rourke a formal Letter of Counseling and required AIGI O'Rourke to attend a formal ethics counseling session by the LSC OIG Special Counsel.

#### **IC Case 21-027: Library of Congress (LOC) OIG**

On March 16, 2021, the IC received a complaint alleging IG Hyde ignored multiple violations of the LOC's hiring process for senior level employees and that he failed to disclose to the Chairman of the U.S. House Committee on House Administration his extensive personal and professional relationship with a Senior Management LOC Employee when the Chairman asked IG Hyde about the Employee's qualifications.

After deliberations, the IC voted to refer the allegations to the IC Chairperson for investigation. The IC Chairperson engaged the U.S. Department of Justice OIG to conduct the investigation on the IC's behalf. After thoroughly reviewing the report of investigation and IG Hyde's comments, the IC found by a preponderance of the evidence that IG Hyde's relationship with the Senior Management LOC Employee wrongfully created the appearance that the independence of IG Hyde (and his office) was compromised.

The IC issued its findings to the Librarian on August 9, 2023. Given that IG Hyde retired from federal service on August 31, 2021, the IC made no recommendation.

#### **IC 22-057: Commodity Futures Trading Commission (CFTC) OIG**

On June 14, 2022, the IC received a complaint alleging IG Lavik abused his authority and/or engaged in conduct undermining his integrity when he wrongfully attempted to extort or pressure CFTC's General Counsel by directing DIG Ringle and a senior CFTC OIG investigative employee to convey his position that failure to resolve OIG personnel requests in a favorable manner would result in a series of adverse actions by the OIG towards the CFTC. The complaint also alleged DIG Ringle abused her authority and/or undermined her integrity by continuing to include the OIG Investigator in CFTC human resource discussions and actions after acknowledging he had a conflict of interest.

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<sup>8</sup> This matter was referred to the IC Vice Chairperson for investigation because the IC Chairperson was recused.

After deliberations, the IC voted to refer the allegations to the IC Chairperson for investigation. The IC Chairperson engaged the OIG of the Export-Import Bank of the United States to conduct the investigation on the IC's behalf. After thoroughly reviewing the report of investigation and DIG Ringle's comments, the IC determined the allegations of wrongdoing against IG Lavik, who retired from federal service on June 16, 2023, and DIG Ringle were not substantiated.<sup>9</sup> Accordingly, the IC made no recommendations. The IC issued its findings to the CFTC Chairman on September 28, 2023.

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<sup>9</sup> IG Lavik opted not to comment on the IC's draft findings.



**COUNCIL OF THE INSPECTORS GENERAL  
ON INTEGRITY AND EFFICIENCY**

**INTEGRITY COMMITTEE**

**CONTACT INFORMATION:**

**INTEGRITY COMMITTEE**

**COUNCIL OF THE INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY**

**1750 H STREET, NW, SUITE 400  
WASHINGTON, DC 20006**

**[Integrity-Complaint@cigie.gov](mailto:Integrity-Complaint@cigie.gov)**

**<https://www.ignet.gov/cigie/committees/integrity-committee>**