



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**OFFICE OF THE  
INSPECTOR GENERAL**

June 12, 2014

Mr. Michael G. Carrol, Acting Inspector General  
United States Agency for International Development  
Attention: Office of the Inspector General  
1300 Pennsylvania Avenue, NW  
Washington, DC 20523


Dear Mr. Carroll,

Enclosed is the final report regarding the Quality Assessment Review (QAR) of the Investigative Operations of the United States Agency for International Development, Office of the Inspector General. This report includes the Opinion Letter and the Letter of Suggested Improvements/Best Practices.

I would like to thank you and your staff for the support and cooperation extended to the QAR team throughout the review process.

Sincerely,

/s/

  
Hubert T. Bell  
Inspector General

Enclosures: As stated

**Final Report on the Quality Assessment Review  
of the Investigative Operations of the  
U.S. Agency for International Development  
Office of the Inspector General**



**Conducted at Washington, District of Columbia**

**by**

**U.S. Nuclear Regulatory Commission  
Office of the Inspector General  
Washington, DC 20555-0001**

**The Honorable Hubert T. Bell Jr., Inspector General  
William B. Borden III, Team Leader**

**April 21-24, 2014**

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June 12, 2014

Mr. Michael G. Carrol, Acting Inspector General  
United States Agency for International Development  
Attention: Office of the Inspector General  
1300 Pennsylvania Avenue, NW  
Washington, DC 20523

Re: Opinion Letter from the Quality Assessment Review of the Investigative Operations of the United States Agency for International Development, Office of the Inspector General

Dear Mr. Carroll,

We have completed our review of internal safeguards and management procedures for the investigative function of the United States Agency for International Development (USAID), Office of the Inspector General (OIG), for the period ending September 30, 2013. Our review was conducted in conformity with the Council of Inspectors General on Integrity and Efficiency (CIGIE) Quality Standards for Investigations and the Attorney General's Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority, as applicable.

We reviewed compliance with USAID OIG's system of internal policies and procedures to the extent we considered them appropriate. Our review was conducted at the U.S. AID, OIG headquarters location in Washington, District of Columbia. We interviewed 11 special agents and support staff assigned to the OIG. Additionally, we reviewed 20 case files for investigations closed during the previous 12-month period.

In performing our review, we have given consideration to the prerequisites of Section 6(e) of the Inspector General Act of 1978 (as amended) and Section 812 of the Homeland Security Act of 2002 (Pub. L. 107-296). These documents authorize law enforcement powers for eligible special agents of each of the various offices of Presidentially-appointed Inspectors General. These powers may be exercised only for activities authorized by the Inspector General Act of 1978, other statutes, or as expressly authorized by the Attorney General.

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Section 1

## OFFICIAL USE ONLY – OIG INVESTIGATION INFORMATION

In our opinion, the system of internal safeguards and management procedures for the investigative function of the USAID, OIG, in effect for the year ending September 30, 2013, is in compliance with the quality standards established by the CIGIE and the Attorney General's Guidelines. These safeguards and procedures followed by your office provide reasonable assurance of conforming with professional standards in the conduct of its investigations

Sincerely,

/s/

Hubert T. Bell  
Inspector General

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**OFFICE OF THE  
INSPECTOR GENERAL**

June 12, 2014

Mr. Michael G. Carrol, Acting Inspector General  
United States Agency for International Development  
Attention: Office of the Inspector General  
1300 Pennsylvania Avenue, NW  
Washington, DC 20523

Re: Letter of Suggested Improvements/Best Practices from the Quality Assessment  
Review of the Investigative Operations of the United States Agency for  
International Development, Office of the Inspector General.

Dear Mr. Carroll,

We have reviewed the internal safeguards and management procedures for the investigative function of the U.S. Agency for International Development (USAID), Office of the Inspector General, in effect for the period ending September 30, 2013. You have been furnished a report revealing the degree of compliance with applicable standards. This letter should be read in conjunction with that information, but this letter does not change that report.

Our review was conducted for the purpose of reporting on the USAID, OIG's internal safeguards and management procedures and the staff's compliance with those standards. The review was conducted in conformity with the standards and guidelines established by the Council of Inspectors General on Integrity and Efficiency and the Attorney Generals Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority, as applicable.

During our assessment, we reviewed 20 case files for investigations closed between October 1, 2012, and September 30, 2013. Enclosure 1 lists the review locations and number of personnel interviewed. Enclosure 2 lists the closed investigative files reviewed. Enclosure 3 is a discussion of areas where, in our view, improvements should be considered, and best practices observed and learned.

Sincerely,

/s/

Hubert T. Bell  
Inspector General

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Section 2

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**Review Location**

Location included in the Assessment:

<u>Office Locations</u>	<u>Number of Personnel Interviewed</u>
U.S. Agency for International Development Headquarters 1300 Pennsylvania Avenue, NW Washington, DC 20523	11

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**Review of Closed Investigative Files**

(March 1, 2012 – February 28, 2013)

<b>Case File Number</b>	<b>Case Closing Date</b>
LA-IS-12-0156	09/30/13
LA-KA-12-0086	09/30/13
AF-HI-12-0241-I	09/30/13
LA-ILA-12-0264-I	09/30/13
AF-CA-12-0005-I	09/20/13
AF-HI-13-0080-I	06/26/13
AF-HI-08-0047-I	06/19/13
AF-CA-12-0407-I	09/13/13
AF-HA-12-0093-I	08/02/13
AF-SA-12-0282	09/13/13
AF-CA-11-0372-I	07/31/13
AF-HI-10-0223-I	05/06/13
AF-CA-13-0163-I	05/13/13
AF-PR-11-0243-I	05/14/13
AF-HA-13-0074	04/12/13
AF-SA-10-0083-I	02/20/13

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<b>Case File Number</b>	<b>Case Closing Date</b>
LA-MA-08-0003-I	02/20/13
AF-HI-10-0260-I	02/14/13
AF-CA-11-0300-I	12/12/12
AF-HI-12-0366-I	11/29/12

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### Suggestions for Improvement/Best Practices

To strengthen the United States Agency for International Development (USAID), Office of the Inspector General (OIG), Office of Investigations' investigative operations and internal safeguards and management procedures, we respectfully submit the following three suggestions for USAID OIG consideration. These suggestions and highlights have been discussed with you and members of your senior staff.

**1. Ensure that Law Enforcement or Investigations-Related Accountable Property such as Specialized Technical/Monitoring Equipment is Periodically Inventoried and Accounted for.**

The Council of Inspectors General on Integrity and Efficiency (CIGIE) Quality Standards for Investigations requires that OIGs conduct a periodic inventory of investigations-related accountable property such as badge and credentials, firearms, and specialized technical equipment. The USAID OIG, Criminal Investigations Manual (CIM), Chapter 36, Technical Equipment, Section 36.8, also states a Technical Equipment Custodian (TEC) will certify and forward their annual inventory reports to the Headquarters (HQ), TEC, no later than October 15<sup>th</sup> of each year. The Headquarters TEC will review all field annual inventory reports, coordinate the reconciliation of any error with field TECs and forward the annual inventory report for equipment kept at Headquarters along with all field annual inventory reports to the SAC of the HQL by October 31<sup>st</sup> of each year.

We reviewed technical equipment inventory reports provided during our Quality Assessment Review (QAR) and observed that seven of nine USAID field offices did not submit their respective annual inventory reports to the HQ TEC by October 15<sup>th</sup> of fiscal year 2013. USAID OIG management reports that a few field units did submit their inventory report, albeit beyond October 15<sup>th</sup>, but management returned the reports due to a lack of uniformity in reporting and consistent formatting of the reports across the field units. Therefore, most of the field units submitted their reports after the October 15<sup>th</sup> requirement established in USAID OIG CIM.

#### Recommendation

It is recommended that the USAID OIG CIM be updated to include language that specifically states the inventory report due by October 15<sup>th</sup> is for the fiscal year ending two weeks earlier on September 30<sup>th</sup>.

It is also recommended that a sample of the required inventory report be appended to this chapter, and section of the CIM, to guide each field unit on what their respective report should look like when submitted.



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### 2. **Bloodborne Pathogens Training**

CIGIE Quality Standards for Investigations, Qualifications, states in part that, “organizations should periodically train criminal investigators on effective and appropriate use of force and constitutional law and other topics articulated in the Attorney General Guidelines or other authoritative guidelines. OIG policies should determine the frequency of, and ensure compliance with, its recurring and periodic training, which, absent unique circumstances, should not exceed 3 years.”

The Occupational Safety and Health Administration (OSHA) Bloodborne Pathogens Standards found in Title 29 of the Code of Federal Regulations at 29 CFR 1910.1030, states “Employers must offer this training on initial assignment, and at least annually thereafter, and when new or modified tasks or procedures affect a worker’s occupational exposure.”

According to USAID OIG CIM, Chapter 5, Bloodborne Pathogens, Section 5.8, C (1) and (2), Responsibilities, Supervisory Special Agents (SSA) are responsible for ensuring that the Bloodborne Pathogens Exposure Control Plan is provided to employees at the time of initial assignment to the 1811 job series and at least annually thereafter. Also, SSAs are responsible for documenting all employees training and submitting it to the DAIG/I on an annual basis.

We observed from a review of individual 1811 special agent training records that the bloodborne pathogens training was not conducted on an annual basis. The Bloodborne pathogens training that was to take place during the “Special Agent In-Service” training scheduled for October 2013, was postponed due to the Federal Government shutdown. Investigative managers advised that they provided the bloodborne pathogens training on a periodic basis, usually during their “Special Agent In-Service” training.

#### **Recommendation**

It is recommended that USAID OIG, conduct bloodborne pathogens training on an annual basis in compliance with OSHA requirements and USAID OIG CIM.

### 3. **U.S. Agency for International Development, Criminal Investigations Manual**

A review of USAID OIG CIM, disclosed that some of the chapters require revision to remove references to positions no longer in existence and practices no longer conducted. One example is referenced in item 1 above. The SAC HQ/L, is a position that no longer exists as part of USAID OIG, investigative operations. There are several chapters of the CIM that still contain references to



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the SAC HQ/L. A second example is found in USAID OIG CIM, Chapter 12, "Firearms and Non-Lethal Weapons," Section 12.3 (A), "Authority to Carry Firearms," which states in part, that the carry of personally owned off-duty weapons must be the same make and model as their OIG-issued duty weapon. OIG learned that at least one special agent was carrying a personally owned off-duty weapon that was a different model than the OIG-issued duty weapon. Accordingly, the USAID AIGI issued a policy memorandum to amend on-the-spot the CIM and authorize the carry of personally owned off-duty weapons that are the same caliber, model or compact model version as their OIG-issued weapon. A final example is found in USAID OIG CIM, Chapter 6, "Health and Fitness Program," Section(s) 6.4, "Program Management," 6.5, "Physical Fitness Coordinator," and 6.8, "Physical Efficiency Battery," which states that the SAC HQ/L has some role or responsibility for the execution of each respective aspect of the Health and Fitness Program. Accordingly, the USAID OIG AIG/I issued a policy memorandum to amend on-the-spot each respective section of the CIM, Chapter 6, that referenced SAC HQ/L and replaced references to SAC HQ/L with the Deputy Assistant Inspector General for Investigations (DAIG/I).

### **Recommendation**

It is recommended that a thorough review of the all chapters of the CIM is conducted and revisions be made to update obsolete positions, practices, and procedures.