

**EXTERNAL QUALITY ASSESSMENT REVIEW OF
THE OFFICE OF INSPECTOR GENERAL FOR THE
TENNESSEE VALLEY AUTHORITY
INVESTIGATIVE OPERATIONS**

April 2019

**Conducted in Knoxville, TN
by
The Office of Inspector General for the
Corporation for National and Community Service
250 E St. SW, Suite 4100
Washington, DC 20525**

**Deborah Jeffrey, Inspector General
Jessica Nelson, SAC, Peer Review Team Leader**

April 15, 2019

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Deborah J. Jeffrey
Inspector General

May 31, 2019

Ms. Jill Matthews
Acting Inspector General
400 West Summit Hill Drive
WT 2C
Knoxville, TN 37902-1401

Subject: Final Report on the Quality Assessment Review of the Investigative Operations of the Office of Inspector General for the Tennessee Valley Authority

Dear Ms. Matthews:

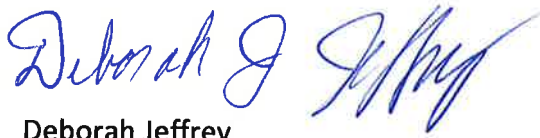
We have reviewed the system of internal safeguards and management procedures for the Office of Investigations, Office of Inspector General, Tennessee Valley Authority (TVA-OIG) in effect for the period ending December 31, 2018. Our review was conducted between March 25-28, 2019, in conformity with the *Quality Standards for Investigations and Quality Assessment Review Guidelines* for Investigative Operations of Federal Offices of Inspector General established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE), and the *Attorney General Guidelines for the Office of Inspectors General with Statutory Law Enforcement Authority*, as applicable.

We reviewed compliance with the TVA-OIG system of internal policies and procedures to the extent we considered appropriate. The review was conducted at the Knoxville, TN, headquarters location. Additionally, we sampled 21 of the 77 investigations closed during calendar year 2018 and interviewed OIG staff.

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

In our opinion, the system of internal safeguards and management procedures for the investigative function of TVA-OIG in effect for the period ending December 31, 2018, was in compliance with the quality standards established by CIGIE and the applicable Attorney General guidelines. These safeguards and procedures provide reasonable assurance of conforming to professional standards in the planning, execution, and reporting of its investigations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Deborah J. Jeffrey". The signature is written in a cursive style with a large initial "D".

Deborah Jeffrey

Attachment A – List of Visited Field Offices

The review was conducted at the TVA-OIG headquarters located in Knoxville, TN. In addition to its headquarters location, TVA-OIG has its investigation personnel located at three field offices in Nashville, TN, Chattanooga, TN, and Huntsville, AL. CNCS-OIG spoke to investigative personnel at TVA-OIG headquarters and from each field office. We found that the individuals interviewed were receiving adequate support and proper oversight.

Attachment B - List of Sampled Closed Investigative Files

<u>Case File Number</u>	<u>Case Closing Date</u>
01B16815	03/08/2018
01C16950	06/04/2018
03F16642	05/08/2018
03F17011	06/04/2018
12A16877/12A16877-01	06/05/2018
12E16559	08/07/2018
12E16619	04/30/2018
13E16709	10/19/2018
14B16944	03/27/2018
18-0006-A	03/16/2018
18-0051-S	10/31/2018
18-0070-A	03/27/2018
18-0072-S	01/05/2018
18-0082-P	03/16/2018
18-0135-A	08/06/2018
18-0152-A	05/25/2018
18-0160-S	09/17/2018
18-0186-HL-A	05/25/2018
18-0308-P	12/20/2018
23A15162/23A15162-01	01/24/2018
25D15497	02/27/2018



Office of the Inspector General

Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1401

Jill M. Matthews

Deputy Inspector General Performing the Duties of the Inspector General

May 14, 2019

The Honorable Deborah Jeffrey
Inspector General
Corporation for National and Community Service
Office of the Inspector General
250 E Street, SW; Suite 4100
Washington, DC 20525

Dear Ms. Jeffrey:

**REPORT ON THE QUALITY ASSESSMENT REVIEW OF THE INVESTIGATIVE
OPERATIONS OF THE OFFICE OF THE INSPECTOR GENERAL FOR THE
TENNESSEE VALLEY AUTHORITY**

We appreciate your suggestions and recommendations to the report on the Quality Assessment Review (QAR) of the Investigative Operations. Our response to each of your suggestions in the report on the QAR is enclosed.

I also want to commend Special Agent in Charge Jessica Nelson and the review team for a job well done. The professionalism exhibited by your staff reflects positively upon your office.

If my office can assist you in the future or if you would like to discuss the draft report further, please contact me at (865) 633-7430.

Sincerely,

Jill M. Matthews

Deputy Inspector General Performing the Duties of the Inspector General

Enclosure

Letter of Observations following the Report on the Quality Assessment Review of the Investigative Operations of the Office of the Inspector General (OIG) for the Tennessee Valley Authority (TVA)

Areas for Potential Improvement

- 1. During the review, investigators noticed TVA-OIG policies did not specify procedures for digital forensic analysis to be conducted by outside agencies. TVA-OIG had extensive policies for internal digital forensic analysis performed by TVA-OIG staff, but no specific procedures for digital forensics performed by outside agencies.**

Recommendation: Revise the digital forensics policy to add procedures for analysis conducted by an outside agency and set up an agreement with an outside agency that will be available to provide forensics if needed.

Response to Recommendation

We agree with the review team's recommendation and are in the process of implementing the suggested changes to include revising the digital forensics policy to add procedures for analysis conducted by an outside agency and set up an agreement with an outside agency that will be available to provide forensics if needed. These changes will be fully implemented upon identification and finalization of the necessary agreements with the outside agency.

- 2. The investigative staff training records demonstrated that TVA-OIG provided its investigators with a significant amount of quality training, on topics such as recent trends in investigative procedures, whistleblower law and employee handbooks. However, the training records showed no recent training in interviewing techniques, as required by TVA-OIG's Investigative Manual.**

Recommendation: Conduct periodic training on interviewing techniques with all investigative staff and include it in the recurring training program. Also include in TVA-OIG's policy how often investigative staff must take interviewing techniques training.

Response to Recommendation

We agree with the review team's recommendation and are scheduling a refresher course on interviewing techniques for all investigative staff. Additionally, interviewing techniques training will be included in the recurring training program to be conducted annually, and our policy will be updated to reflect this requirement.



Deborah J. Jeffrey
Inspector General

April 15, 2019

Ms. Jill Matthews
Acting Inspector General
400 West Summit Hill Drive
WT 2C
Knoxville, TN 37902-1401

Subject: Letter of Observations following the Report on the Quality Assessment Review of the Investigative Operations of the Office of Inspector General for the Tennessee Valley Authority

Dear Ms. Matthews:

This is a supplement to our Report on the Quality Assessment Review of the Investigative Operations of the Office of the Inspector General of the Tennessee Valley Authority (TVA-OIG), dated April 11, 2019.

During the course of our review we noted areas for potential improvement, which do not impact your office's compliance rating.

In particular, the reviewers observed the following:

1. During the review, investigators noticed TVA-OIG policies did not specify procedures for digital forensic analysis to be conducted by outside agencies. TVA-OIG had extensive policies for internal digital forensic analysis performed by TVA-OIG staff, but no specified procedures for digital forensics performed by outside agencies.

Recommendation: Revise the digital forensics policy to add procedures for analysis conducted by an outside agency and set up an agreement with an outside agency that will be available to provide forensics if needed.

2. The investigative staff training records demonstrated that TVA-OIG provided its investigators with a significant amount of quality training, on topics such as recent trends in investigative procedures, whistleblower law and employee handbooks. However, the training records showed no recent training in interviewing techniques, as required by TVA-OIG's Investigative Manual.

Recommendation: Conduct periodic training on interviewing techniques with all investigative staff and include it in the recurring training program. Also include in TVA-OIG's policy how often investigative staff must take interviewing techniques training.

If you or your staff have any questions concerning these observations, SAC Jessica Nelson is available at (202) 606-9363.

Sincerely,


Deborah Jeffrey