October 7, 2019

Michael C. Westfall  
State Inspector General  
Virginia Office of the State Inspector General  
101 N. 14th Street, 7th Floor  
Richmond VA, 23219

Dear State Inspector General Westfall,

The Association of Inspectors General (AIG) performed a Peer Review of the Virginia Office of the State Inspector General (OSIG) Investigations, Audit, and Behavioral Health and Developmental Services (BHDS) Divisions at your request. The Peer Review Team (PRT) evaluated the work of these three divisions covering the last three years (July 1, 2016 to June 30, 2019). The PRT performed the review during the week of October 1, 2019 through October 4, 2019 at your office located at 101 N. 14th Street, 7th Floor Richmond VA, 23219. The PRT assessed the work of the Investigations and BHDS Divisions for compliance with the AIG Principles and Standards for Offices of Inspector General (Green Book) and the Audit Division for compliance with the Generally Accepted Government Auditing Standards (GAGAS) (Yellow Book) issued by the U. S. Government Accountability Office (GAO). These standards are consistent with the qualitative standards under which your office’s Investigations, Audit, and BHDS Divisions have operated throughout the review period.

The four person PRT consisted of the following individuals:

- Sean M. Wood, CIGI, Regional Investigator Supervisor, Office of Inspector General, Florida Department of Children & Families
On behalf of the PRT, I am pleased to advise that we found no reportable instances of failure to meet these standards. There are no limitations or qualifications on our opinion. It is the unanimous conclusion of the PRT members that the reviewed areas of the Virginia OSIG met all relevant major AIG and GAGAS standards for the period under review.

The remainder of this letter sets forth the purpose, scope, and methodology of the Peer Review.

**Purpose:**

The PRT conducted an independent, qualitative review of the Virginia OSIG’s Investigations, Audit, and BHDS Divisions, focusing on their compliance with agreed-upon AIG and GAGAS standards.

**Scope:**

The Peer Review covered Investigations, Audit, and BHDS Divisions’ operations, resulting work products, and related file materials chosen from closed investigations, inspections, and completed audits between July 1, 2016 and June 30, 2019. The Peer Review’s scope also covered the Divisions’ compliance with their relevant policy and process manuals and procedural guides; staff qualifications; and professional training requirements. Lastly, the PRT assessed supervisory review and quality control over the work products, reporting of results, and the Virginia OSIG’s relationship and communications with outside agencies. For this last step, the PRT met with external stakeholders with whom the Virginia OSIG frequently work, or who are the recipients of the Virginia OSIG work products. The PRT notes that the overall consensus of these stakeholders was that the Virginia OSIG "is important to the well being of the Commonwealth."

**Method:**

The PRT generally followed the AIG Peer Review/Qualitative Assessment Review Checklists for the Investigations, Audit, and BHDS Divisions. These Checklists are based on the AIG and GAGAS standards. The PRT also called upon their own professional experience as senior managers of various Offices of Inspectors General and through their knowledge of and familiarity with best practices within the Inspector General community.

Prior to the actual on-site review, the PRT requested information from the Virginia OSIG, including but not limited to policy and procedures manuals, complaint intake documents, closed case logs, a list of issued reports, and a list of external stakeholders. We also reviewed reports and information available on your website. The PRT used this information to randomly select the work products and related case materials that were ultimately reviewed.

On October 1, 2019, the PRT held an entrance conference with you and your executive
leadership, during which time we explained the Peer Review scope, methodology, limitations, and proposed schedule. Following that conference, we delivered our request for sample review materials. During the week, the PRT conducted their fieldwork through examination of the selected case files. The PRT also interviewed staff from the Investigations, Audit, and BHDS Divisions, and other administrative sections. Interviewees for the divisions/sections included the communications director, quality assurance manager, deputy inspectors general; managers, investigators; auditors; analysts; compliance specialists; and office support staff.

The PRT also reviewed the relevant personnel files of Virginia OSIG employees, to including their Training and Continuing Education files, and all relevant policy and process manuals and procedural guides. All file requests were met fully and timely.

The PRT also met with you and other members of your leadership team to gauge their involvement and interaction with Investigations, Audit, and BHDS Divisions, including:

- Corrine Loudin, Deputy Inspector General for Investigations and Administration
- Mike Taylor, Deputy Inspector General for Audit
- Keith Davies, BHDS Compliance Manager
- Eris Jones, Quality Assurance Manager

The PRT conducted all interviews in confidence and without any limitation on scope or time. PRT members requested follow-up interviews and explanations, as well as any supplemental documentation, and Virginia OSIG staff graciously accommodated the PRT.

The PRT independently chose and interviewed numerous stakeholders external to the Virginia OSIG. These interviews were arranged in advance by your staff between the PRT and the stakeholders for the purpose of evaluating agency cooperation, effectiveness, and responsiveness. Stakeholders included representative from the:

- Virginia Office of the Governor
- Virginia Attorney General’s Office
- Virginia Office of the Secretary for Administration
- Virginia Office of the Auditor of Public Accounts
- Virginia Department of Corrections
- Virginia State Police
- Virginia Office of Behavioral Health and Developmental Services

Finally, the PRT held an exit conference with you and your executive leadership on October 4, 2019, during which time the PRT shared its conclusion that the Virginia OSIG met the AIG and GAGAS standards. PRT members provided observations and opinions gathered during the review. These observations did not limit or qualify the opinion of the PRT, but were shared with you and your leadership as possible areas of consideration going forward. These observations, which will also include areas of distinction, will be
detailed later in a separate management letter.

As noted above, it is the unanimous conclusion of the PRT members that the reviewed areas of the Virginia OSIG met all relevant major AIG and GAGAS standards for the period under review.

On behalf of the AIG, please accept our thank you for the confidence placed in the Association by requesting that we conduct this review. The PRT would like to acknowledge and thank your designees, Eris Jones and Sherri Carneal, for all of their efforts in the coordination and planning of this event and for providing the necessary records and tools for a thorough and smooth review. The hospitality and professionalism was outstanding and commendable. Finally, on behalf of the PRT, please know that in all of our interactions with you and your staff, we were shown the respect and cooperation that is the hallmark of a professional staff truly interested in a full and open review of their work. At the same time, this has been a learning experience for each member of the PRT, for which we wish to convey our sincerest gratitude.

Please feel free to contact me or any member of the PRT should you have any questions.

PRT Leader, AIG Peer Review for Virginia OSIG, October, 2019

cc:  
- Lise Valentine, CIGA, Team Member for the October 2019 Peer Review of the Virginia OSIG, Deputy Inspector General for Audit and Program Review, City of Chicago Office of Inspector General
- Sean M. Wood, CIGI, Team Member for the October 2019 Peer Review of the Virginia OSIG, Regional Investigator Supervisor, Office of Inspector General, Florida Department of Children & Families
- Hector Collazo Jr., AIG Chair, Peer Review Committee
- Flora Miller, AIG Co-Chair, Peer Review Committee