



September 2022

MILITARY INSPECTORS GENERAL

Opportunities Exist to Strengthen Processes for Administrative Investigations and Training

GAO Highlights

Highlights of [GAO-22-105316](#), a report to congressional requesters

Why GAO Did This Study

IGs play an important role in ensuring accountability of organizations to their employees. That accountability is especially important when it comes to IG administrative investigations of complaints related to discrimination, favoritism, health and safety of the workforce, and whistleblower reprisal. Military service IG offices and command IG offices provide oversight and assistance through inspections, investigations, and evaluations within DOD. These IGs do not have the statutory independence that other federal IGs have.

GAO was asked to review the processes for administrative investigations in these IG offices. This report (1) assesses the extent to which the administrative investigation policies and procedures in selected military service and command IG offices comply with applicable standards and (2) describes the hiring practices and evaluates requirements for training at military service IG offices. GAO conducted 21 site visits to service and command IG offices, discussed and documented IG policies and practices, and compared policies and practices to applicable IG standards.

What GAO Recommends

GAO is making seven recommendations to revise established policies to support the independence of command IGs and improve training for IG personnel. The selected IG offices generally agreed with the recommendations and discussed planned implementation steps.

View [GAO-22-105316](#). For more information, contact Kristen Kocielek at (202) 512-2989 or kociolek@gao.gov or Elizabeth Field at (202) 512-2775 or fielde1@gao.gov.

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What GAO Found

The Army, Navy, Marine Corps, and Air Force each have a service-level Inspector General (IG) and subordinate command-level IG offices. Within these four military services, there are over 390 command-level IGs along with 11 combatant command IGs. GAO found that the selected military service and command-level IG offices' policies and procedures for administrative investigations generally comply with applicable standards, including those for whistleblower reprisal complaints. Specifically, these IG offices designed and developed tools to implement policies and procedures for receiving a complaint, determining a course of action, performing investigations if deemed applicable, and ensuring the quality of investigations through management and legal reviews. Whistleblower reprisal investigations have additional protections requiring that the Department of Defense (DOD) IG perform an independent review.

However, three out of the four military service IG offices and one combatant command IG office GAO selected for review lack policies that support command IG independence in opening investigations. Specifically, policies of the Army, Air Force, Marine Corps, and U.S. Indo-Pacific Command IG offices require that command IGs receive approval from the directing authority, which at times is the IG's commanding officer, prior to initiating an IG investigation. Requiring such approval could affect the ability of an IG to perform independent, objective administrative investigations.

Officials from the military service IG offices stated that to mitigate this independence concern, a command IG has the option of elevating the complaint to the military service IG. However, this option is not explicitly addressed in military service IG policies. Without clear policies on the processes for initiating investigations, command IGs may not have the authority to independently initiate IG-appropriate investigations, increasing the risk that DOD personnel do not have access to fair and impartial investigations.

Selected military service IG offices followed standard hiring practices and had policies and procedures in place to provide initial training to IG staff, but some lacked requirements for recurring training and mechanisms to monitor completion of such training. Each military service IG office had an initial training program ranging from 1 to 3 weeks that is required for each new employee. These training programs address key aspects of administrative investigations. However, the IG offices within the Army, Navy, and Air Force have not established requirements for recurring training in their respective policies for all of their personnel who conduct administrative investigations, and do not have mechanisms to track recurring training.

GAO found that many of the selected command IGs do not regularly conduct administrative investigations and thus may not be able to maintain proficiencies through regular conduct of investigations. Without establishing requirements for recurring training and developing a mechanism to verify compliance, the military service IGs and command IGs are not able to provide reasonable assurance that their personnel are maintaining professional proficiencies.

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Abbreviations

CIGIE	Council of the Inspectors General on Integrity and Efficiency
DOD	Department of Defense
IG	Inspector General
IG Act	Inspector General Act of 1978
INDOPACOM	U.S. Indo-Pacific Command
USD (P&R)	Under Secretary of Defense (Personnel and Readiness)

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September 28, 2022

The Honorable Jackie Speier
Chair
Subcommittee on Military Personnel
Committee on Armed Services
House of Representatives

The Honorable Gerald E. Connolly
Chairman
Subcommittee on Government Operations
Committee on Oversight and Reform
House of Representatives

Inspector General (IG) offices provide oversight and assistance through inspections, investigations, and evaluations within the Department of Defense (DOD). Almost 3 million military and civilian personnel rely on IGs to respond appropriately to complaints. While military service and command-level IGs within the services are not organizationally independent, unlike those established by the Inspector General Act of 1978, as amended (IG Act), they play an important role in ensuring accountability of the service branches to their military and civilian employees.¹ That accountability is especially important when it comes to IG administrative investigations of complaints related to discrimination, favoritism, health and safety of the workforce, and whistleblower reprisal.²

Because of this importance, you asked us to review and evaluate the military service and command-level IG offices' administrative investigation processes, as well as the hiring and training practices of these offices for staff conducting administrative investigations. This report (1) evaluates the extent to which selected military service and command-level IG offices have designed and implemented policies and procedures for conducting administrative investigations—including for whistleblower reprisal investigations—that comply with applicable standards and (2) describes the hiring practices in selected military service IG offices for

¹Pub. L. No. 95-452, 92 Stat. 1101 (1978), *codified as amended at* 5 U.S.C. app. The DOD IG is established under the IG Act. See 10 U.S.C. § 141; see also IG Act, §§ 3, 12(2).

²Administrative investigations generally are investigations in response to allegations of fraud, waste, abuse, and other mismanagement that are not criminal in nature.

civilian and military staff who conduct administrative investigations and evaluates the extent to which military service training requirements to conduct these investigations comply with applicable standards.

The scope of our review consisted of the policies and procedures for conducting administrative investigations, including those for whistleblower reprisal investigations, and for hiring and training at (1) the four established military service IG offices (Army, Navy, Marine Corps, and Air Force³); (2) a nongeneralizable sample of 16 out of more than 390 command-level IG offices;⁴ (3) a nongeneralizable sample of one, U.S. Indo-Pacific Command (INDOPACOM), out of 11 combatant command-level IG offices;⁵ and (4) a nongeneralizable sample of three out of 73 federal agency IG offices outside of DOD.⁶

For purposes of this report, we refer to the 16 selected command-level IG offices and the one selected combatant command-level IG office as command IGs. We selected our nongeneralizable samples based on (1) office staffing size, a mixture of high, medium, and low staffing levels; (2) staffing structure, offices staffed with both active duty military and federal civilians as well as offices with only active duty military personnel; and (3) geographic location, within as well as outside the continental U.S. Our review was limited to administrative investigations and the design and implementation of policies and procedures related to those investigations. We did not review criminal investigative procedures, which are generally not part of military service and command IG responsibilities. Because the command-level, combatant command-level, and federal agency IG offices

³Space Force is currently covered by the Air Force IG structure.

⁴The 16 command-level IG offices selected for our review were (1) 1st Marine Division, (2) Marine Corps Installations West, (3) Marine Central Command, (4) Marine Corps Air Station New River, (5) Naval Sea Systems Command, (6) Commander Navy Region Southeast, (7) Commander U.S. Pacific Fleet, (8) Naval Education and Training Command, (9) Air Education and Training Command, (10) Air Force Technical Applications Center, (11) 20th Fighter Wing, (12) 301st Fighter Wing, (13) U.S. Army Recruiting Command, (14) First Army, (15) Army 311th Signal Command, and (16) 94th Army Air and Missile Defense Command.

⁵A combatant command is a military command with broad continuing missions and may be a specific combatant command that is under a single commander or a unified combatant command composed of significant assigned components of two or more military departments. The combatant command selected for review was INDOPACOM, a unified combatant command.

⁶These three IG offices were selected among those that were created by the IG Act. They are the Department of Health and Human Services IG office, Department of State IG office, and Department of Veterans Affairs IG office.

were selected as nonprobability samples, we cannot generalize the results of our review to IG offices we did not contact. However, the results represent a cross-section of command-level IG offices within each of the four military services and should therefore still provide useful information for understanding these issues.

To address our first objective, we reviewed the design and implementation of policies and procedures, including quality assurance practices, related to conducting administrative investigations at selected IG offices. This included whistleblower reprisal investigations. To determine whether policies and procedures were designed and implemented adequately, we obtained and reviewed IG policies related to each part of the administrative investigation process. We interviewed officials from the selected IG offices to determine how procedures were being applied to complaint intake, course-of-action determinations, full investigations, and case closure processes. We also performed site visits, in person and virtually, to observe the implementation of policies and procedures at each selected IG office.

Policies we reviewed included DOD directives, instructions, and manuals;⁷ an Army regulation;⁸ a Navy instruction;⁹ a Marine Corps order;¹⁰ Air Force policy directive and instruction;¹¹ a command-level IG

⁷DOD Directive 5106.04, *Defense Inspectors General* (May 14, 2020); DOD Directive 7050.06, *Military Whistleblower Protection* (Apr. 17, 2015); DOD Directive 5505.06, *Investigations of Allegations Against Senior DOD Officials* (Apr. 28, 2020); DOD Directive 5106.04, *Combatant Command Inspectors General* (June 19, 2006); DOD Instruction 1020.04, *Harassment Prevention and Responses for DOD Civilian Employees* (June 30, 2020); DOD Instruction 1020.03, *Harassment Prevention and Response in the Armed Forces* (Dec. 29, 2020); DOD Instruction 7050.01, *DOD Hotline Program* (Oct. 17, 2017); DOD Manual 5106.06, *Joint Inspectors General Manual* (May 7, 2018); Department of Defense, *Joint Inspector General Concept and Systems Guide* (Apr. 1, 2011); and Department of Defense, *Joint Inspector General Investigations Guide* (Apr. 2, 2018).

⁸Army Regulation 20-1, *Inspector General Activities and Procedures* (Mar. 23, 2020).

⁹Secretary of the Navy Instruction 5430.57H, *Mission and Functions of the Naval Inspector General* (Dec. 17, 2019).

¹⁰Marine Corps Order 5430.1A W/Admin Ch., *Marine Corps Inspector General Program* (Jan. 28, 2019).

¹¹Department of the Air Force Policy Directive 90-3, *Inspector General* (Feb. 3, 2021); Air Force Instruction 90-301, *Inspector General Complaints Resolution* (Sept. 30, 2020).

policy;¹² and the Council of the Inspectors General on Integrity and Efficiency's (CIGIE) *Quality Standards for Federal Offices of Inspector General*.¹³

To address our second objective, we reviewed the policies and procedures for hiring and training military and civilian IG personnel who conduct administrative investigations at the four established military service IG offices and the selected command IGs. We reviewed policies and interviewed officials from these offices about procedures related to the hiring practices, qualifications, and training for military and civilian IG personnel who conduct administrative investigations. We also compared selected IG offices' training policies and procedures to DOD policies and CIGIE standards.

In addition, we interviewed officials and reviewed policies of three selected federal agency IG offices outside of DOD that were established by the IG Act. Our selection of these three offices was based on (1) agency type, as we narrowed our selection to include only executive departments, which are the largest type of agency in the federal government; (2) agency structure, that is, agencies that are most similar in complexity to the structure of DOD; and (3) geographic responsibility, or agencies covering similar areas to those of DOD. We reviewed these selected IG offices to provide context on the applicable standards, processes, and quality assurance practices used for conducting administrative investigations. We obtained and reviewed three selected federal agency IG offices' policies and procedures and interviewed officials from the selected IG offices about the complaint intake, evaluation, referral, and investigation processes in place. We compared these policies and procedures with those of the selected military service and command IG offices. See appendix I for further discussion of the results of our work concerning these three selected federal agency IG offices.

¹²U.S. Indo-Pacific Command Instruction 5106.01, *Inspector General Activities* (Feb. 1, 2022).

¹³CIGIE is composed primarily of federal agency IGs authorized by the IG Act and other statutes. The mission of CIGIE is to address integrity, economy, and effectiveness issues that transcend individual government agencies and to increase the professionalism and effectiveness of personnel by developing policies, standards, and approaches to aid in establishing a well-trained and highly skilled workforce in the Offices of Inspector General. Council of the Inspectors General for Integrity and Efficiency, *Quality Standards for Federal Offices of Inspector General* (August 2012).

We conducted this performance audit from June 2021 to September 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The military service and command IG offices provide oversight and assistance through audits, inspections, investigations, and evaluations within the military services. Military department IGs are authorized by statute in title 10 of the *U.S. Code*, while the Marine Corps IG and command IG offices within the services have been established administratively.¹⁴ Certain combatant commands are also required by law to have IG offices.¹⁵

Structure of Military Service IG Offices

The military service IGs are fundamentally different from the DOD IG and other federal agency IGs established by the IG Act. The military service IGs are not subject to the statutory independence requirements provided by the IG Act. The secretary for each of the military departments appoints the IG for that military department for a term of approximately 3 to 4 years. A Deputy Naval Inspector General detailed from among the general officers of the Marine Corps serves as the Marine Corps IG. Military service IG offices usually have an IG, deputy IG, senior enlisted advisor, inspections division, investigations division, hotline intake division, administrative support division, and legal counsel. Each military service IG is responsible for developing IG policy, guidance, and procedures, and for establishing complaint resolution processes within the military service. Each military service IG office has oversight authority of all IG investigations within its purview, to include commenting on and reviewing any command IG findings.

Each of the military service IGs has subordinate command IGs throughout each military service. Within the four military services (Army, Navy, Marine Corps, and Air Force), there are over 390 command IGs. In addition, there are 11 combatant command IGs, some established by statute and others administratively. Each command IG and combatant command IG is selected by the commander, also referred to as the

¹⁴10 U.S.C. §§ 7020 (Army), 8020 (Navy), 9020 (Air Force).

¹⁵10 U.S.C. §§ 167, 167b.

directing authority, or by the human resource command of its respective organization within each service and DOD. In addition, command IGs report directly for their commander.¹⁶

Military Service IG Roles and Responsibilities

Military service IGs' major responsibilities are to inspect and assess readiness of military commands; provide training; assist complainants with identifying the proper organization to handle their issue; investigate complaints against senior officials; investigate military whistleblower reprisal complaints not investigated by the DOD IG office; and investigate or inquire into matters concerning fraud, waste, abuse, or mismanagement.¹⁷

Military service and command IGs only perform IG investigations on issues that are deemed IG appropriate. There is a wide range of issues that the military service and command IGs are not normally responsible for investigating, including criminal complaints, civilian whistleblower reprisal complaints, sexual harassment complaints, and many other issues that are deemed command issues. Issues that are not IG appropriate are routinely referred to other parts of each military service, DOD IG, or outside of DOD. According to all four military service IGs, more than 90 percent of all complaints result in some type of resolution other than an IG investigation.

Complaint Analysis and Investigation Process

The military service and the command IG offices follow the same basic complaint analysis and investigation process. IG hotline personnel receive complaints through phone, fax, email, mail, online website portal, personal contact, referral from DOD IG or Congress, and other means through which personnel can report issues. Military service and command IG offices enter complaint information into their case management systems, where a complaint will then become a case, and evaluate the information to determine an appropriate course of action.

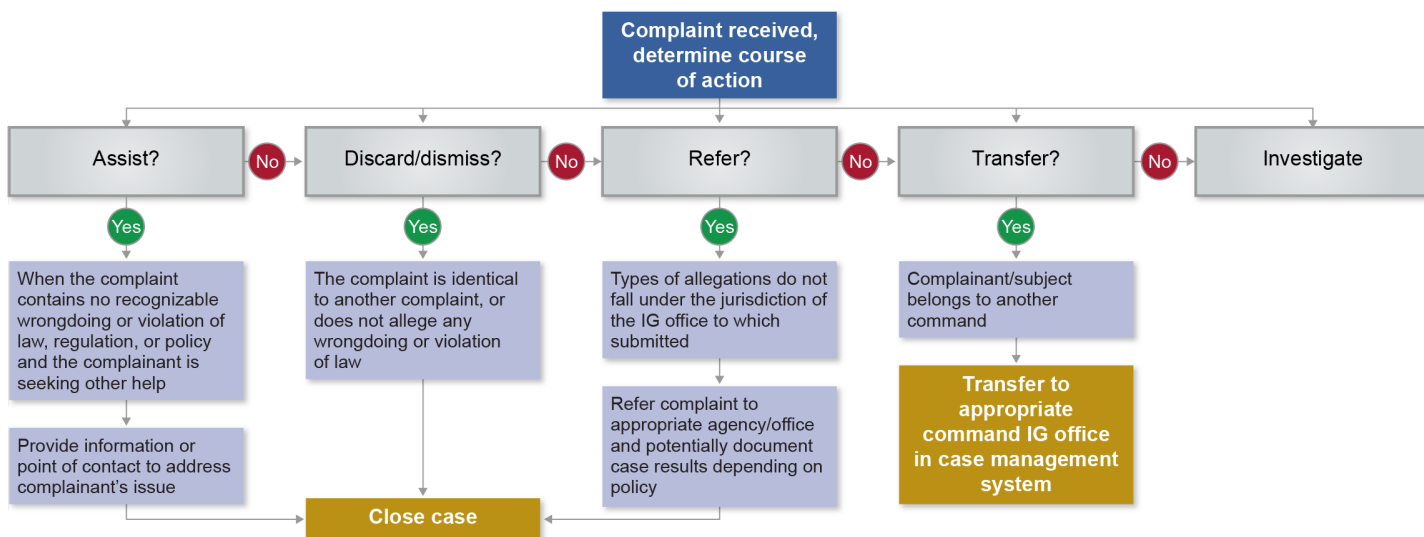
The IG office personnel analyze the case information to determine if a case is within the office's jurisdiction. If the case is not, it is transferred to the appropriate military service or command IG office. If a complaint is within the office's jurisdiction, the personnel then analyze it to determine

¹⁶The commander in this case is an official who has authority to direct an IG investigation or inspection. Commanders or directors who are authorized IGs on their staffs may direct IG investigations and IG inspections within their commands.

¹⁷DOD IG has the first right of refusal to investigate military whistleblower reprisal complaints.

the type of case and interview the complainant to gather additional information and supporting documentation. Once the IG office personnel obtain all the required information, they determine a specific course of action. The potential courses of action for the case are assist, discard/dismiss, refer, transfer, or investigate. An IG office will assist a complainant in cases where providing basic information to the complainant resolves the issue or will help the complainant contact the correct organization that can assist with the issue. If another organization has the primary responsibility for responding to a complaint, such as a criminal complaint, the IG refers the case directly to that organization. See figure 1 for a flowchart of the military service and command IG course-of-action determination process.

Figure 1: Military Service and Command Inspectors General Course-of-Action Determination Process



DOD Department of Defense
IG Inspector General

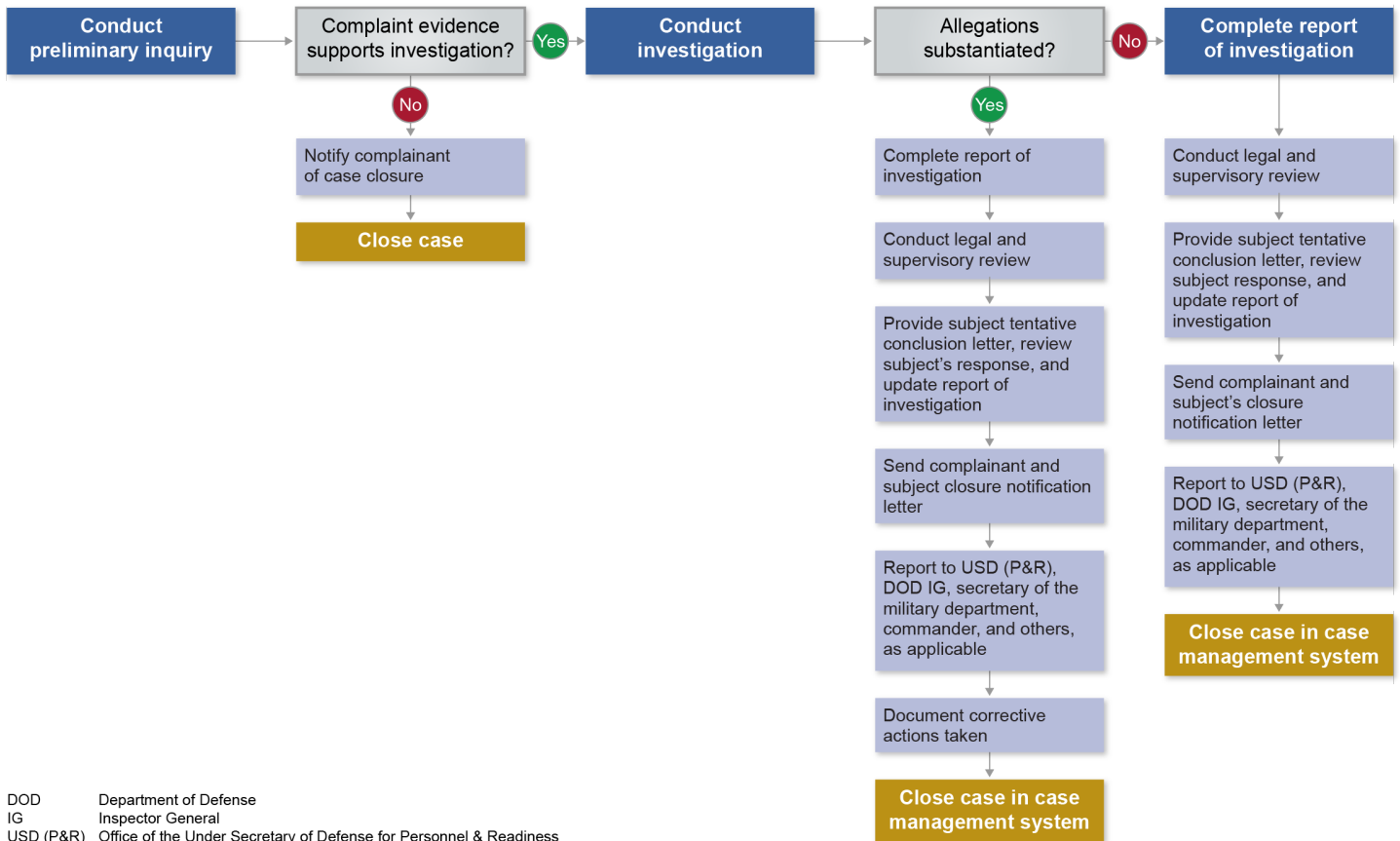
Source: GAO analysis of DOD military service IG office's information. | GAO-22-105316

If an IG office's determination is to investigate, it will perform a preliminary inquiry. The purpose of the preliminary inquiry is to verify that an investigation is needed, who should do the investigation, and whether there is enough information for investigation. The preliminary inquiry includes the following elements: conducting clarification interview, gathering evidence, consulting with subject matter experts, analyzing evidence, consulting legal counsel, and determining whether to close or investigate. The preliminary inquiry is generally not to exceed 30 days from the date the complaint was received.

A case may warrant an investigation when the complaint alleges improper conduct (i.e., conduct that violates an identifiable standard), the alleged improper conduct is appropriate for a military service IG or command IG investigation, and other courses of action are not available to address the complaint. The purpose of a full investigation is to determine whether allegations are substantiated or not substantiated, to recommend corrective actions, and to identify root causes and systemic issues, generally within 90 to 180 days of receipt of the complaint.

The complainant will be notified throughout the process, such as when a course of action is determined, when the determination is made that the evidence does not support an investigation, or when the investigation results in substantiation or nonsubstantiation of the allegation made in the complaint. In addition, subjects of investigations are given an opportunity to comment or provide additional information when the allegations against them are found to be substantiated. Figure 2 outlines the military service and command IG preliminary inquiry and investigation processes.

Figure 2: Military Service and Command Inspectors General Preliminary Inquiry and Investigation Process



DOD Department of Defense
 IG Inspector General
 USD (P&R) Office of the Under Secretary of Defense for Personnel & Readiness

Source: GAO analysis of DOD military service IG office's information. | GAO-22-105316

The Air Force and Navy military service and command IGs stated that they annually receive tens of thousands of complaints from various sources. The Army and the Marine Corps military service and command IGs stated that they annually receive around 2,000 complaints from various sources. During our audit, the four military service IGs reported that they had 3,651 open cases in their case management systems.¹⁸ Cases are generally maintained in one of four service-level case

¹⁸The Navy IG, U.S. Marine Corps IG, and Army IG case data were as of December 31, 2021. The Army IG non-senior official case data were as of December 31, 2021, and the Army IG senior official case data were as of April 1, 2022. The Air Force IG senior official case data were as of December 31, 2021, and the Air Force IG non-senior official case data were as of February 9, 2022.

management systems where they can be tracked throughout the complaint intake and resolution processes.

Whistleblower Reprisal Protections

When making a protected communication, whistleblowers are protected from reprisal through various statutes, regulations, and presidential policies covering different DOD personnel groups.¹⁹ A whistleblower reprisal complaint involves a service member or civilian who makes, prepares to make, or is perceived as making or preparing to make a protected communication, and who has experienced either (1) the taking of or threatening to take an unfavorable personnel action, or (2) the withholding of or threatening to withhold a favorable personnel action.²⁰

A variety of offices respond to whistleblower reprisal complaints depending on factors outlined in several sections of the *U.S. Code*. Generally, military service IGs only investigate complaints where the whistleblower reprisal complainant is a member of the military. The DOD IG and Office of Special Counsel investigate whistleblower reprisal complaints from civilians. Table 1 summarizes the statutory and policy authorities covering DOD personnel and the office responsible for handling the complaint, along with selected protected disclosure and prohibited personnel actions, which are two required elements of the test for determining whether there was reprisal against a complainant for whistleblowing.²¹

¹⁹For example, a protected communication includes any communication in which a service member communicates information to a member of Congress; an IG; or a member of a DOD audit, inspection, investigation, or law enforcement, or court martial proceeding.

²⁰GAO has issued several reports assessing DOD's whistleblower protections. See GAO, *Whistleblower Protection: Actions Needed to Improve DOD's Military Whistleblower Reprisal Program*, [GAO-12-362](#) (Washington, D.C.: Feb. 22, 2012); *Whistleblower Protection: DOD Needs to Enhance Oversight of Military Whistleblower Reprisal Investigations*, [GAO-15-477](#) (Washington, D.C.: May 7, 2015); *Whistleblower Protection: Opportunities Exist for DOD to Improve the Timeliness and Quality of Civilian and Contractor Reprisal Investigations*, [GAO-17-506](#) (Washington, D.C.: Sept. 29, 2017); and *Whistleblower Protection: Analysis of DOD's Actions to Improve Case Timeliness and Safeguard Confidentiality*, [GAO-19-198](#) (Washington, D.C.: Mar. 7, 2019).

²¹A protected disclosure, sometimes called a protected communication, is a disclosure of wrongdoing by a whistleblower to a party that is an eligible recipient of that disclosure. Prohibited personnel actions are those actions that are taken or threatened in response to a protected disclosure, such as termination; reassignment; or a significant change in duties, responsibilities, or working conditions.

Table 1: Whistleblower Protections for Department of Defense (DOD) Military Service Members, Civilians, and Contractors

DOD personnel group	Authority	Selected protected disclosures	Selected prohibited personnel actions	Responsible office for complaints
Military service members	10 U.S.C. § 1034	Violation of any law, rule, or regulation. Gross waste of funds. Abuse of authority. Substantial and specific danger to public health or safety. Gross mismanagement. Preventing or attempting to prevent lawful communication to a member of Congress or an inspector general (IG).	Taking or withholding, or threatening to take or withhold, a personnel action. Any other significant change in duties or responsibilities not commensurate with the service member's grade.	DOD IG or military service IG offices
Appropriated-fund civilians	5 U.S.C. §§ 2301 and 2302	Violation of any law, rule, or regulation or gross mismanagement. Gross waste of funds. Abuse of authority. Substantial and specific danger to public health or safety.	Detail, transfer, or reassignment. Decision concerning pay, benefits, or awards. Any other significant change in duties, responsibilities, or working conditions.	Office of Special Counsel and DOD IG
Non-appropriated-fund instrumentality employees	10 U.S.C. § 1587	Violation of any law, rule, or regulation or mismanagement. Gross waste of funds. Abuse of authority. Substantial and specific danger to public health or safety.	Disciplinary or corrective action. Any other significant change in duties or responsibilities inconsistent with the employee's salary or grade level.	DOD IG
Employee of a contractor, subcontractor, grantee, subgrantee, or personal services contractor	10 U.S.C. § 4701 (formerly 10 U.S.C. § 2409)	Violations of any law, rule, or regulation related to a DOD contract or grant. Abuse of authority relating to a DOD contract or grant. Gross mismanagement of a DOD contract or grant.	Discharging, demoting, or otherwise discriminating against the employee.	DOD IG
Defense Civilian Intelligence Personnel System employees and employees with eligibility for access to classified information	Presidential Policy Directive 19 50 U.S.C. § 3234	Violation of any law, rule, or regulation. Gross waste of funds. Abuse of authority. Substantial and specific danger to public health or safety. Mismanagement.	Termination. Reassignment. Demotion. Taking or withholding, or threatening to take or withhold, any action affecting an employee's eligibility for access to classified information.	IG offices of the Defense Intelligence Agency, the National Geospatial-Intelligence Agency, the National Reconnaissance Office, and the National Security Agency

Source: GAO analysis of whistleblower statutes and Presidential Policy Directive 19. | GAO-22-105316

Selected IG Offices’ Policies and Procedures for Administrative Investigations Generally Comply with Applicable Standards, but Some Do Not Support the Independent Initiation of Investigations

The IG offices selected for our review generally designed adequate policies and procedures for conducting administrative investigations, including for military whistleblower reprisal investigations, and took steps to implement their policies and procedures. However, three out of the four military service IG offices we reviewed do not have policies that support command IG independence in opening investigations.

Selected IG Offices Have Adequate Processes for Administrative Investigations

The IG offices in our review have adequate processes for key aspects of administrative investigations: complaint intake, course-of-action determination, investigations, and quality assurance.

Complaint Intake

Military service and command IG offices designed and took steps to implement policies and procedures for receiving complaints. The four military service IG offices’ policies and procedures outline the steps for conducting complaint intake, including entering all complaint information into the service’s case management system. Command IG offices had supplemental guides and local standard operating procedures that discussed complaint intake procedures for their specific offices. During our site visits, we observed various tools that the IG offices developed to implement these procedures. Specifically, they had processes in place to perform initial intake of complaints that come through hotline systems, email, phone, fax, mail, or personal contact. The IG offices also designated staff to review complaints and initially review the information presented. In addition, the military service IG offices developed training for their staff on complaint intake procedures.

DOD Instruction 7050.01, *DOD Hotline Program*, requires IG offices to establish procedures to promptly receive, prioritize, process, control, inquire, independently and objectively review, and report on all allegations the hotline, a mechanism through which to communicate complaints,

receives. In addition, CIGIE's *Quality Standards for Federal Offices of Inspector General* states that each IG office should establish and follow policies and procedures for receiving and reviewing allegations. By having established procedures for conducting complaint intake, each of the selected IG offices was prepared to consistently receive and process complaints for validity and relevance, allowing complaints to be considered for investigation or other action. These established policies and procedures were important because military service IGs receive tens of thousands of complaints annually.

Course-of-Action Determination

Military service and command IG offices designed and took steps to implement policies and procedures for determining the appropriate course of action for handling complaints, including whether the complaint will be assisted, referred, transferred, discarded/dismissed, or investigated. The four military service IG offices' policies and procedures outline the steps for determining a course of action, including conducting a thorough preliminary complaint analysis of assertions and evidence. The goal of this analysis is to determine the validity of the issues and an appropriate complaint resolution strategy, including determining if the allegation is appropriate for an IG to investigate. The IG offices support implementation of these policies through initial training and through on-the-job actions, which we observed during our site visits. For example, some IG offices had detailed lists of complaint types and the governing laws and policies related to the complaint types that they used to determine the best course of action.

According to the selected IG offices, many complaints relate to issues that other offices are better suited to investigate, and the IG offices have procedures in place to refer a complaint to the appropriate office. Several IG offices stated that more than 90 percent of complaints result in a course of action other than an IG investigation. For example, complaints that include a criminal allegation, including sexual assault, are referred to offices other than that of the IG, such as the Army's Criminal Investigation Division or the Navy Criminal Investigative Service.

In addition, during our site visits we observed that some IG offices tracked complaints referred to other non-IG offices until final resolution, and others closed a complaint after the referral. Both processes appropriately result in referrals going to responsible offices but offer varying levels of information on the final resolution of each complaint.

DOD Instruction 7050.01 states that cases opened in response to complaints that require further review may be referred for action or

information and are closed when an inquiry is complete, findings have been approved, corrective actions have been addressed, and the review process is complete. In addition, CIGIE's *Quality Standards for Federal Offices of Inspector General* states that each IG office should establish and follow policies and procedures for reviewing allegations to ensure that an appropriate disposition is made for each allegation. By having established procedures for appropriately determining the course of action for a complaint, IG offices helped ensure that complaints are handled by the most appropriate personnel within DOD to bring about a quick resolution for each complainant.

Investigations

The military service and command IG offices designed, and took steps to implement, policies and procedures for performing administrative investigations. For administrative investigations, a complaint may warrant IG investigation when it alleges improper conduct, the alleged improper conduct is appropriate for IG investigation, and more appropriate avenues of relief are not available to address it.

The four military service IGs' policies and procedures outline steps to gather the information necessary for investigation, report results, perform follow-up, and close a case in the system. The selected IG offices designed policies and procedures and implemented controls intended to limit access to case information, applied applicable standards related to each complaint, and included management's review of case determinations. The selected IG offices also had policies requiring legal sufficiency reviews of investigative findings to help ensure that appropriate legal standards were applied.

Selected IG offices had additional procedures for whistleblower reprisal investigations that added further assurance that whistleblower reprisal complaints were investigated appropriately. Specifically, whistleblower reprisal complaints from military personnel are first provided to DOD IG for review. IG offices use a specific DOD IG reprisal complaint notification form to document compliance with this requirement.²² DOD IG has authority to investigate any such complaint that it chooses to, and can also send complaints to the military service or command IG for investigation. Once the military service or command IG completes the investigation and processes it through internal IG reviews, the DOD IG

²²10 U.S.C. § 1034; DOD Directive 7050.06, *Military Whistleblower Protection* (rev. Oct. 12, 2021).

will review the final investigation and, if needed, request additional details before approval.

DOD Directive 7050.06, *Military Whistleblower Protection*, requires complaints that the prohibitions of restriction or reprisal have been violated to be reported to the DOD IG generally within 30 days of receipt by a DOD component. The DOD component head and the DOD IG are each responsible for ensuring that the investigating IG is outside the immediate chain of command of both the service member submitting the whistleblower reprisal complaint(s) and the individual(s) alleged to have taken the retaliatory action, or is at least one organization higher in the chain of command than the organization of the service member submitting the allegation and the individual(s) alleged to have taken the retaliatory action.

Finally, selected IG offices designed policies and procedures for investigations involving senior officials and assigned personnel to implement them. Specifically, the selected IG offices have specialized investigators at the military service IG level who process all complaints against senior officials; these investigators generally have several years of IG experience and handle only senior official allegations.

DOD Directive 5505.06, *Investigations of Allegations Against Senior DOD Officials*, requires allegations of misconduct against senior officials to be reported to the DOD IG within 5 workdays of receipt by a DOD component. Unless notified that the DOD IG assumes investigative responsibility for a particular matter, the DOD component will initiate an investigation into the issues raised in the complaint and provide the DOD IG with a written report of any disciplinary or administrative action taken against a senior official within 5 workdays after such action is taken.

The Office of the Deputy Inspector General for Administrative Investigations' *Administrative Investigations Manual* is DOD's guidance for those who conduct or perform oversight investigations into allegations of misconduct of senior officials or whistleblower reprisal. It states that good investigative plans give investigators, supervisors, and attorneys a road map for conducting focused, thorough, and efficient investigations. Additionally, CIGIE's *Quality Standards for Investigations* requires that if the decision is to initiate an investigation, the organization should begin any necessary immediate actions and establish, if appropriate, an investigative plan of action (whether verbal or written) as soon as possible. During the investigation, organizations should, when appropriate, also consider using a time-phased approach. Such an

approach ensures that individual leads are pursued on a timely basis, identifies any causative factors that should be reported as weaknesses or internal control issues requiring corrective action by agency management, and involves ongoing coordination with appropriate agency officials. It also ensures that the investigation is conducted efficiently and effectively.

By designing and implementing policies and procedures for conducting investigations, the selected IG offices have helped to ensure that appropriate steps are taken in investigating complaints, leading to resolutions for affected victims. In addition, the additional controls in place for both whistleblower reprisal and senior official investigations help ensure that cases are handled as required by law.

Quality Assurance

The military and command IG offices designed and developed mechanisms to implement policies and procedures to help ensure the quality of their investigations. The four military service IG offices' policies and procedures outline the steps for quality assurance, including requiring all investigations to receive a quality review by the IG office staff and all reports to undergo a legal review. The IG offices support implementation of the quality assurance controls through checklists used as part of the investigative process.

There are multiple levels of review throughout the investigation process, including a preliminary analysis review during the intake process and periodic file reviews of cases in the complaint systems. Additionally, fully investigated cases receive legal sufficiency reviews and management reviews before complaints are substantiated. The subject of an investigation also has an opportunity to comment on the allegations and evidence developed and offer additional evidence or witnesses that may be material to the matter under investigation. For whistleblower reprisal investigations, there is also an additional level of assurance: the DOD IG reviews all cases and command responses before case closure.

DOD Directive 5106.01 requires the DOD IG to monitor and evaluate investigations and internal reviews. DOD Instruction 7050.01 requires the DOD IG to conduct quality assurance reviews of cases closed to verify compliance with the quality standards of qualifications, independence, and due professional care. Additionally, the Office of the Deputy Inspector General for Administrative Investigations' *Administrative Investigations Manual* requires that all final reports of administrative investigations into complaints of misconduct against senior DOD officials or of whistleblower reprisal undergo a quality review process. This process helps ensure that final reports meet the professional standards for quality and that they are

thorough, factually accurate, legally sufficient, and professionally prepared. CIGIE's *Quality Standards for Federal Offices of Inspector General* states that an internal quality assurance program should be structured and implemented to ensure an objective, timely, and comprehensive appraisal of operations.

By having established quality assurance procedures, the selected military service IG and command IG office personnel help ensure that procedures for each stage of an administrative investigation are applied consistently and appropriately. In turn, personnel that come to the IG offices for assistance receive appropriate responses to their complaints.

Some Military Service and Command IG Policies and Procedures Do Not Support Independence in Initiating Investigations at Command Offices

The military service IG offices designed and took steps to implement policies and procedures that support independence of investigations that their respective organizations conduct. For example, the military service IGs have the autonomy to determine the need to fill a vacancy and to interview and hire both civilian and military IG office personnel. In addition, each of the military service IG offices establishes and implements its own onboarding and training program.²³ For the administrative investigation process, the military service IGs have the authority to initiate an investigation upon receipt of a complaint that is deemed IG appropriate to investigate, and do not require any approval to initiate an individual investigation.

However, the command IG offices of the Army, Air Force, and Marine Corps and the INDOPACOM IG office do not have policies that provide reasonable assurance that administrative investigations are independent. Specifically, each IG office's policies either expressly state that authorization from a commander, directing authority, or appointing authority must be obtained prior to initiating an IG investigation or lack clear guidance on the issue. The directing authority and appointing authority of the command IG offices are generally the commanding officer of each organization, such as the INDOPACOM Commanding General.²⁴

²³The Marine Corps IG uses Navy, Army, and Air Force IG office training courses when onboarding investigators.

²⁴The directing authority is the official who determines the objectives, scope, focus, and other details of the assigned activity. The commander or director of a DOD component is normally the directing authority for IG investigations, inspections, and audits in that component. In addition, according to Air Force policy, the appointing authorities have the singular authority to direct IG investigations, appoint investigators, and approve reports of investigations directed under their authority.

Directing authorities and appointing authorities are normally not positions within the command IG or service IG offices.

- Army regulation states that only the directing authority can authorize IG investigations using a written and signed directive. In addition, it states that command IGs can only direct and approve investigative inquiries with written authority from the respective directing authority.
- Air Force instructions outline that the Air Force IG Complaints Resolution Program requires that each investigation be initiated and closed in writing by a designated appointing authority.
- Marine Corps orders are silent on the requirement for command IGs to obtain approval from their directing authority prior to initiating an investigation. However, Marine Corps IG office personnel stated that the expectation would be for the command IG to obtain permission from the commander in order to conduct an investigation.
- INDOPACOM instructions state that the IG will obtain a directive from the directing authority prior to initiating any formal investigation.

DOD policy requires all DOD personnel to have access to fair and impartial IGs. Further, CIGIE's *Quality Standards for Federal Offices of Inspector General* states that in all matters relating to investigative work, the investigative organization must be free, both in fact and appearance, from impairments to independence; must be organizationally independent; and must maintain an independent attitude.

While several of the military service IGs stated that they have not been notified of an instance where a command IG was prevented from performing an IG investigation, the ability of an IG to perform independent, objective administrative investigations is still affected when the IG must obtain commander approval before initiating an investigation. For example, personnel at an Army command IG office stated that they assumed that if an IG-appropriate complaint were received—other than a complaint concerning whistleblower reprisal or senior officials—the commander would initiate a command investigation, conducted by personnel assigned by the commander, rather than the IG. The same personnel stated that they normally expect the command, not the IG, to handle any issue that requires investigation.

Officials from the military service IG offices stated that to mitigate the risk of a commander inappropriately denying approval to conduct a command IG investigation, a command IG has the option of elevating the complaint

to the military service IG. However, this option is not explicitly addressed in military service and command IG policies.

Without clear policies on the processes for initiating investigations, command IGs may lack the independence to initiate IG-appropriate investigations, increasing the risk that DOD personnel may not receive fair investigations of their complaints and may lack access to IGs who are independent in fact and appearance.

Military Service IGs Follow Standard Hiring Practices, but Most Services Do Not Require Recurring Training

Military Service IGs Follow Federal and Internal Practices for Hiring Civilian and Military IG Personnel Who Conduct Administrative Investigations

Each of the military services and their respective command IG offices have specific hiring practices and qualifications for civilian and military IG personnel who conduct administrative investigations, with slight differences among the services. For each of the military service and respective command IG offices, having both civilian and military IG personnel conduct administrative investigations provides a mix of continuity with long-term civilian personnel and real-time perspective from military IG personnel. None of these offices uses contractors to conduct administrative investigations.

The military services and their respective command IG offices use the Office of Personnel and Management's federal hiring guidelines and the federal hiring site USAJobs to guide and facilitate their civilian IG personnel hiring processes. In addition, the IG offices each use their own applicable internal hiring standards to guide civilian hiring processes. Training for these IG offices is generally centralized for all personnel at the military service IG level. Table 2 outlines the military service IG offices' headquarters hiring practices for their civilian personnel who conduct administrative investigations, including background check and security clearance requirements.

Table 2: Military Service Inspector General (IG) Office Headquarters Hiring Practices for Civilian IG Personnel Who Conduct Investigations

Hiring practice	Army	Navy	Marine Corps	Air Force
Uses Office of Personnel and Management guidelines, internal service hiring standards, and the USAJobs website to guide and facilitate the civilian IG office personnel hiring processes	•	•	•	•
Uses background checks to screen civilian IG office investigators	•	•	•	•
Checks the service’s IG office system of record for previous IG cases	•	•	•	X ^a
Requires civilian IG investigators to obtain and maintain top secret or secret security clearances throughout their tenure in an IG office	•	•	•	•

Legend:

- = military service IG headquarters office uses the hiring practice
- X = military service IG headquarters office does not use the hiring practice

Source: GAO analysis of military service information. | GAO 22-105316

^aThe Air Force conducts searches in its case management system for certain officer positions but plans to expand this search to all IG personnel.

According to IG officials from each of the services, the average tenure of the civilian IG office personnel who conduct administrative investigations ranges from 5 to 20 years. The civilian personnel who conduct administrative investigations are hired under the 1801 and 1810 federal job series, which covers positions that supervise, lead, or perform work related to inspections, investigations, enforcement, or compliance. To qualify for this series, candidates must have a demonstrated ability to perform this type of work. Although not required, IG officials from all four services also stated that they often hire civilians with prior military experience. The Army, Navy, and Marine Corps service and command IG offices search their case management systems for any previous complaints against all potential civilian hires prior to hiring former members of their respective military services as IG office personnel.

The military services select military IG office personnel from the overall military service population and base their specific selection practices on applicable internal military service standards. Specifically, each of the services

- has a career management system that service members can use to view available IG rotations;

-
- checks the service's IG office system of record for any open, pending, or closed complaints against a potential candidate prior to placement in the IG office;²⁵ and
 - requires military service IG office investigators to obtain and maintain top secret or secret security clearances throughout their tenure in the IG office.

The military service IG office assignment is treated as a temporary specialty rotation or detail that lasts for about 24 to 36 months, and there is not a specific military occupational specialty that is required to be selected. IG officials from each of the services stated that there are benefits to having both civilian and military IG personnel. For example, although civilians can serve as IG subject matter experts because of their longer tenures compared to military IG personnel, military IG personnel can offer a perspective on what is currently occurring in the field, which helps to create a functional balance within the IG office.

Military Service IG Offices Require Initial Training, but Most Do Not Require or Track Recurring Training to Maintain Competency

All Military Service IG Offices Require Initial Training for Personnel Who Conduct Administrative Investigations

Each of the military service IG offices require initial training for their respective headquarters and command IG offices that ranges from about 1 to 3 weeks for personnel who conduct administrative investigations. Completing this training is also a requirement for personnel to be certified to conduct IG investigations. We have previously reported on the importance of training. For example, our guide for assessing strategic training and development efforts in the federal government states that training involves developing a strategic approach that establishes training priorities, and that agency leaders should communicate the importance of training and encourage employees to participate in training activities.²⁶ The initial training requirements for IG office personnel who conduct

²⁵The Air Force conducts searches in its case management system for certain officer positions but plans to expand this search to all IG personnel.

²⁶GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington D.C.: March 2004).

administrative investigations are specific to the individual military service IG offices.

- **Army.** The Army IG School conducts a 3-week classroom-based basic training course that all civilian and military Army IG office personnel must attend and pass as part of the IG certification process. The U.S. Army Training and Doctrine Command and the American Council on Education accredit this course every 3 years. The IG School is the Army IG system's primary venue for training and professionally developing military and civilian personnel to serve in an Army IG office. The basic training topics include investigations, assistance, and whistleblower reprisal investigations. Army officials stated that IG office candidates will not perform any IG personnel functions until completing the basic training course and becoming certified.²⁷
- **Navy.** Navy IG office personnel who conduct investigations are required to undergo the Navy IG office certification process, which includes classroom training, observations, and demonstrations. Specifically, these IG office personnel are required to complete a basic hotline investigator course that qualifies them to perform basic inquiries into allegations of fraud, waste, and abuse. Navy officials stated that the Navy IG office is planning to expand its certification program to include a 4-day basic hotline investigations course and a military whistleblower reprisal investigations course, but officials did not provide a time frame for finalizing these requirements.
- **Marine Corps.** Marine Corps IG office personnel must attend either DOD IG's Joint Inspector General Certification course, Association of Inspectors General courses, Federal Law Enforcement Training Center courses, or CIGIE courses. They also must attend a Marine Corps IG Mobile Training Team Course to be certified as an IG.²⁸ The Marine Corps' goal is for IG office personnel to complete all IG investigative training within 6 months of being assigned to the office.

²⁷The IG School is an educational institution that focuses on teaching Army IG office personnel to implement the U.S. Army IG system and its functions as employees of an IG office. This separate training program is unique to the Army. The other services train their IG personnel as part of a training certification program but do not have a separate function to manage and implement the training.

²⁸The Association of Inspectors General is a nonprofit, membership organization for agencies and professionals in the IG community whose mission is to establish and encourage adherence to quality standards; sponsor professional development and networking opportunities; certify individuals in IG-specific disciplines; support offices in governmental and external relations; and inspire governmental entities to embrace the IG model as an effective tool in the fight to combat waste, fraud, and abuse.

Three Out of Four Services Offer but Do Not Require Recurring Training and Do Not Have Mechanisms to Track This Training

- **Air Force.** Air Force IG office personnel must attend the initial Air Force IG training course within 90 days of assignment, although attendance is preferred prior to their assignment. This 1-week course and curriculum is managed by the Air Force IG Chief of Training and includes the investigations process, whistleblower reprisal investigations, and the Air Force case management database. Military and civilian IG personnel who conduct administrative investigations are certified upon successful completion of this initial training.

The Marine Corps has documented policies for its recurring training requirements for IG office personnel, as well as for tracking such training. However, the Army, Navy, and Air Force do not have recurring training requirements for their IG office personnel who conduct administrative investigations and do not have mechanisms to track recurring training.

- **Marine Corps.** The Marine Corps has a documented policy requirement for recurring training and tracking of training for all IG office personnel. According to Marine Corps guidance, all IG office personnel whose duties involve investigation functions must complete biennial proficiency requirements to maintain their professional certification as IG investigators. These requirements include attending an IG mobile training refresher course that lasts 3 to 4 days and covers all aspects of IG investigations, including hotline policies. IG personnel must also attend an annual ethics course. In addition to requiring recurring training, the Marine Corps IG office is required to maintain and track training data for all IG personnel at all command levels. Specifically, Marine Corps IG guidance states that the Marine Corps IG office will maintain statistics of all command IG personnel training.²⁹ Officials stated that this order requires them to track all training, which, according to officials, is tracked for all IG personnel using a virtual training platform and the Marine Corps IG case management system.
- **Army.** The Army IG School conducts three 1-week advanced courses each fiscal year that all Army civilian IG office personnel must attend every 5 years. This course focuses on inspections, assistance, and investigations. Those civilian IG office personnel who do not complete this requirement may be subject to decertification and would not be able to perform any duties for the IG office. However, Army officials told us that they do not have mechanisms to track and verify compliance with this 5-year requirement. Army officials also stated that the military IG investigators may or may not complete this course requirement because their rotations are 36 months on average; thus, the 5-year training

²⁹Marine Corps Order 5430.1A, *Marine Corps Inspector General Program* (Jan. 28, 2019).

requirement is not applicable. The IG school also offers multiple optional training tools, including instructional videos and tutorials focused on IG office functions.

- **Navy.** The Navy has several ongoing IG training initiatives, though none of the requirements are documented within policy for all Navy IG office personnel who conduct administrative investigations. For example, the Navy IG has a certification program that includes a 40-hour recurring educational requirement every 24 months. However, the office does not have a documented policy that requires this certification or a recurring education requirement. Although not required Navy-wide, the Naval Sea Systems Command and U.S. Pacific Fleet Command have recurring education requirements to maintain professional competencies. Naval Sea Systems Command IG office personnel are required to obtain a minimum of 8 hours of recurring professional education credits for each certification discipline per fiscal year. U.S. Pacific Fleet Command policy requires its IG office personnel to maintain 40 hours of training every 2 years. The Navy does not have service-level mechanisms or a system in place to track the recurring training. However, officials stated that the Navy encourages IG office personnel to track training using their individual development plans.
- **Air Force.** The Air Force provides refresher training that all Air Force IG office personnel are required to attend at least every 3 years in accordance with the Air Force instruction.³⁰ Air Force IG officials told us that there are also annual opportunities for their IG office personnel to participate in optional recurring training. Specifically, the Air Force IG Chief of Training facilitates enterprise-wide webcasts four to six times per year to serve as an overall refresher for those personnel who conduct IG administrative investigations. In addition, there is an annual 3-day in-person IG refresher training that covers best practices and other IG-relevant topics. Although there are required and optional recurring trainings, Air Force IG headquarters officials stated that they currently do not track recurring IG office personnel training enterprise-wide in accordance with the Air Force instruction. Some officials told us that they are able to track their training within the Air Force case management system; however, this is not done across the Air Force.

The military service IG offices and their respective command IG offices do offer recurring training and have some training requirements. However, a lack of a recurring training and tracking requirement may create an increased risk that investigators—particularly at smaller command IG offices who often conduct one or fewer investigations within a year—may

³⁰Air Force Instruction 90-301.

not be able to maintain proficiency in the skills needed for the job. Further, lack of recurring training may affect the timeliness of investigations because of the need to provide on-the-job training prior to starting an investigation.

IG officials from multiple command IG locations stated that they have conducted few to no administrative investigations over their years as IG officials and therefore have limited or no opportunities for on-the-job training. For example, officials from one Air Force command IG office stated that they have not conducted an investigation since 2014. The officials further stated that if tasked to do an investigation, they would need to consult the manual, as their staff would not be as familiar with the investigations process as they would need to be. Also, officials from two other Air Force command IG offices stated that they have not conducted a formal administrative investigation within the last 3 years. In addition, officials from a Marine Corps command IG office stated that they have not received any direct complaints to their office and few, if any, IG investigations have been conducted by their office. Army command IG officials stated that they have not conducted an investigation and assume that they will not conduct an administrative investigation in their offices because of Army requirements that instruct command IG officials to refer a majority of allegations to the command for resolution. However, the IG office must conduct investigations of all whistleblower reprisal and senior official allegations and cannot refer them to the command for action.

The lack of recurring training requirements and the tracking of completion of these requirements enterprise-wide is due to the Army, Navy, and Air Force IGs not establishing these requirements in policy or tracking that existing requirements are being followed. Military service IG officials stated that they have sufficient initial required training and recurring training options, and that they have not felt the need to require or track recurring training in part because some personnel are in their IG office positions for a relatively brief time. As a result, these services do not have an approach that systematically links the requisite knowledge, skills, and abilities to training requirements throughout an investigator's career progression.

However, CIGIE's *Quality Standards for Investigations* states that the training of an investigator should be a recurring process and that a continuous career development program should be established to provide the proper preparation, training, and guidance to develop trainees into professionally qualified investigators and supervisors. Moreover, CIGIE's *Quality Standards for Investigations* also states that IG policies should

determine the frequency of, and ensure compliance with, the IG's recurring and periodic training, which should not exceed 3 years, absent unique circumstances, to ensure that investigators have the requisite knowledge, skills, and abilities throughout their careers.

Without establishing requirements for recurring training and developing mechanisms to verify compliance or track those requirements for all IG office personnel who conduct administrative investigations, the military service IG and their respective command IG offices are not able to provide reasonable assurance that their personnel who conduct investigations collectively possess professional proficiencies for the tasks required throughout their IG office career.

Conclusions

Military service and command IG offices play a key role in ensuring accountability, ethical conduct, and overall effective operations within DOD. The establishment of policies and procedures for responding to complaints from military and civilian DOD personnel is one of the most important roles within the broader responsibilities of the IG offices. Military service and command IG offices we reviewed have generally designed and taken steps to implement policies and procedures to respond to complaints. However, without clear assurances of independence at the command IG level, military and civilian complainants may be discouraged from coming forward with valid concerns.

In addition, a well-trained IG office staff is necessary to help ensure that complaints are responded to appropriately. While initial IG training appears to address key requirements, recurring training for IG office personnel helps ensure that their knowledge is up-to-date when a complainant comes to an IG office for assistance. If IG offices do not address identified independence impairments and recurring training weaknesses, complainants may not receive fair investigations of their complaints by well-trained IG office personnel and may lack access to IGs who are independent in fact and appearance.

Recommendations for Executive Action

We are making seven recommendations, including two to the Army IG, two to the Air Force IG, one to the Marine Corps IG, one to the Navy IG, and one to the INDOPACOM IG.

- The Inspector General of the Army should revise established policies to require that if a command IG is denied the approval to conduct an IG investigation by the directing authority, the command IG should refer the complaint to the Army IG for appropriate action. (Recommendation 1)

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- The Inspector General of the Air Force should revise established policies to require that if a command IG is denied the approval to conduct an IG investigation by the directing authority, the command IG should refer the complaint to the Air Force IG for appropriate action. (Recommendation 2)
 - The Inspector General of the Marine Corps should revise established policies to require that if a command IG is denied the approval to conduct an IG investigation by the directing authority, the command IG should refer the complaint to the Marine Corps IG for appropriate action. (Recommendation 3)
 - The Inspector General of INDOPACOM should revise established policies to require that if the INDOPACOM IG is denied the approval to conduct an IG investigation by the directing authority, the IG should refer the complaint to the DOD IG for appropriate action. (Recommendation 4)
 - The Inspector General of the Army should establish requirements for recurring training that are systematically linked to the requisite knowledge, skills, and abilities needed throughout an investigator's career, and establish a means for tracking this training. (Recommendation 5)
 - The Inspector General of the Air Force should institute a means for tracking compliance with established training requirements throughout an investigator's career. (Recommendation 6)
 - The Inspector General of the Navy should establish requirements for recurring training that are systematically linked to the requisite knowledge, skills, and abilities needed throughout an investigator's career, and establish a means for tracking this training. (Recommendation 7)

Agency Comments and Our Evaluation

We provided a draft of this report to the IG offices for the Army, Air Force, Marine Corps, Navy, and INDOPACOM, as well as for the Departments of State, Veterans Affairs, and Health and Human Services for review and comment. We received written comments from the Air Force, Marine Corps, and Navy IG offices, which are reproduced in appendixes II through IV and summarized below. The Army and INDOPACOM IG offices provided responses via email, which are summarized below. Army, Navy, and Department of Health and Human Services IG offices also provided technical comments, which we incorporated as appropriate. The IG offices of the Departments of State and Veteran Affairs did not have any comments on our report.

The selected IG offices generally agreed with the recommendations and discussed planned implementation steps. Specifically, for

recommendations 1 through 4 related to policies to require the command IG to refer a complaint to the military service IG or DOD IG if approval to conduct an IG investigation is denied by the directing authority, the offices responded as follows:

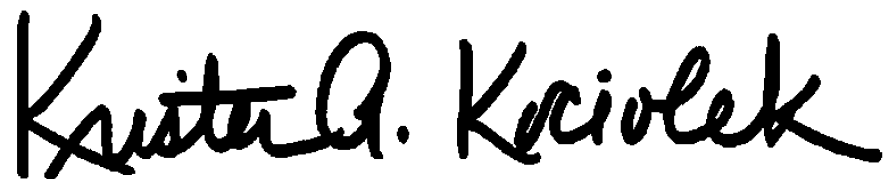
- The Army IG office stated that it had no issue with the recommendation as written and would craft corrective action plans.
- The Air Force IG office stated that it will implement the recommendation and is currently updating policy.
- The Marine Corps IG office concurred with the recommendation and stated that it will incorporate changes into the next policy update.
- The INDOPACOM IG office did not agree or disagree with the recommendation; however, it stated that the IG office will update policy to address the recommendation.

For recommendations 5 through 7 related to establishing requirements for recurring training and a means for tracking this training, the offices responded as follows:

- The Army IG office stated that it had no issue with the recommendation as written and would craft corrective action plans.
- The Air Force IG office provided information clarifying that its current policy meets the expectations of our draft recommendation to establish requirements for recurring training, and stated that the IG office will revise its policy to require a tracking system. Thus, for our final recommendation, we removed the language related to establishing requirements for recurring training, and focused our recommendation on instituting a means for tracking compliance with those requirements throughout an investigator's career.
- The Navy IG office did not agree or disagree with the recommendation. However, the IG office provided a detailed description of how it plans to implement changes to its training program in response to the recommendation.

We are sending copies of this report to the appropriate congressional committees; the Secretary of Defense; and the Inspectors General of the Department of Defense, Department of State, Department of Veterans Affairs, Department of Health and Human Services, Army, Navy, Marine Corps, Air Force, and U.S. Indo-Pacific Command. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or members of your staff have any questions regarding this report, please contact Kristen Kociolek at (202) 512-2989 or kociolekk@gao.gov or Elizabeth Field at (202) 512-2775 or fielde1@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix V.



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Appendix I: Federal Agency Inspector General Office Comparisons

As part of our review, we spoke to officials in three federal agency Inspector General (IG) offices established by Congress under title 5 of the *U.S. Code* in the Inspector General Act of 1978, as amended (IG Act), to compare attributes of those offices to attributes of the military service IG offices established within components of the Department of Defense (DOD) under title 10 of the *U.S. Code*. We spoke to officials in the IG offices of the Department of Health and Human Services, Department of State, and Department of Veterans Affairs.

The military service IG offices are fundamentally different from the DOD IG and other federal agency IG offices established by the IG Act. We selected the three federal agency IG offices that are most similar to DOD's IG office according to our selection criteria. Our selection criteria consisted of each respective agency's (1) type, as we narrowed our selection to include only executive departments; (2) structure, that is, we selected the federal agencies that are most similar in complexity to the structure of DOD; and (3) geographic responsibility, or agencies covering similar areas to those of DOD within the U.S. as well as outside the continental U.S.

We compared the following attributes of the federal agency IG and military service IG offices: operational independence; processes for complaint intake and course-of-action determination; handling of administrative, whistleblower reprisal, and senior official investigations; and quality assurance reviews.

Operational Independence

In comparison to the federal agency IGs, military service IGs do not have independent staffing authority or budget authority, and some command IGs must request approval from their commanders to begin investigations, as shown in table 3. Specifically, federal agency IGs established by the IG Act are operationally independent from their agencies and have their own authority to hire, contract, and otherwise operate their offices. Supervision of the federal agency IGs themselves is strictly limited, and there are safeguards against their removal.

Additionally, federal agency IG offices have specific protections in the federal budget process, including that the President's budget submission to Congress must separately identify the IG-requested budget amounts within agency budgets and any IG comments that a budget would substantially inhibit the IG office from performing its duties must be included. Further, an agency head cannot prevent or prohibit a federal agency IG from initiating, carrying out, or completing any audit or

**Appendix I: Federal Agency Inspector General
Office Comparisons**

investigation, or from issuing any subpoena. Federal agency IGs have the authority to conduct investigations as they judge necessary or desirable.

In contrast, the military service IGs are established as components of their respective services and do not have independent staffing or budget authority. Also, although the military service IGs can begin investigations independently, the command level IGs from the Army, Air Force, Marine Corps, and INDOPACOM, who execute their functions on behalf of their commanders, must receive approval from their directing authorities before beginning an investigation.

Table 3: Comparison of Federal Agency and Military Service Inspector General (IG) Office Operational Independence

IG attributes	Department of Health and Human Services IG office	Department of State IG office	Department of Veterans Affairs IG office	Military service IG office
Mandated independent staffing authority	Yes	Yes	Yes	No
Mandated independent budgetary authority	Yes	Yes	Yes	No
Independence to begin investigation without agency approval	Yes	Yes	Yes	Partial

Source: GAO analysis of federal agency and military service IG office information. | GAO 22-105316

Complaint Intake Process

We did not identify any notable differences in the complaint intake process between the federal agency IG offices and military service IG offices we reviewed, as shown in table 4.

Table 4: Comparison of Federal Agency and Military Service Inspector General (IG) Office Complaint Intake Process

Actions IG performs	Department of Health and Human Services IG office	Department of State IG office	Department of Veterans Affairs IG office	Military service IG office
Complaints are received by email, phone, fax, in-person, or any means possible	Yes	Yes	Yes	Yes
IG office initially screens complaint to determine course of action	Yes	Yes	Yes	Yes
IG office inputs information into case management system	Yes	Yes	Yes	Yes

Source: GAO analysis of federal agency and military service IG office information. | GAO 22-105316

**Appendix I: Federal Agency Inspector General
Office Comparisons**

**Course-of-Action
Determination Process**

We did not identify any notable differences in the course-of-action determination process between the federal agency IG offices and military service IG offices we reviewed, as shown in table 5.

Table 5: Comparison of Federal Agency and Military Service Inspector General (IG) Office Course-of-Action Determination Process

Actions IG performs	Department of Health and Human Services IG office	Department of State IG office	Department of Veterans Affairs IG office	Military service IG office
Analyst determines appropriate complaint resolution strategy (e.g., assist, referral, and dismissal)	Yes	Yes	Yes	Yes
Allegations of sexual harassment are referred to an office outside of the IG office	Yes	Yes	Yes	Yes

Source: GAO analysis of federal agency and military service IG office information. | GAO 22-105316

Handling of Investigations

Military service IG offices do not investigate criminal matters, as shown in table 6. For the military service IG offices, allegations of a criminal nature are normally not appropriate for IG investigation and are referred to special offices within the services that investigate criminal matters. For example, criminal complaints involving sexual assault at the Navy are referred to and investigated by the Naval Criminal Investigative Service. However, if the special office declines to investigate the criminal allegation, the military service IG office may conduct an investigation using its usual administrative methods. In addition, results and findings of military service IG investigations are not reported externally. Federal agency IG offices have obligations to report externally to Congress. For example, each IG office prepares a semiannual report summarizing its activities and submits it to the agency head, who must transmit it to appropriate committees of Congress within 30 days of receiving it. Federal agency IGs publish their semiannual reports, and certain other reports and documents, on their websites.

Table 6: Comparison of Federal Agency and Military Service Inspector General (IG) Office Handling of Investigations

Actions IG performs	Department of Health and Human Services IG office	Department of State IG office	Department of Veterans Affairs IG office	Military service IG office
Office investigates noncriminal allegations	Yes	Yes	Yes	Yes
Office performs investigations of serious criminal allegations	Yes	Yes	Yes	No
Office reports results externally	Yes	Yes	Yes	No

Source: GAO analysis of federal agency and military service IG office information. | GAO 22-105316

**Appendix I: Federal Agency Inspector General
Office Comparisons**

Handling of Whistleblower Reprisal Investigations

The military service IG offices do not investigate complaints received from a defense contractor in which reprisal is alleged, as shown in table 7. Military service IG offices refer those allegations to the DOD IG office and the Office of Special Counsel.

Table 7: Comparison of Federal Agency and Military Service Inspector General (IG) Office Handling of Whistleblower Reprisal Investigations

Actions IG performs	Department of Health and Human Services IG office	Department of State IG office	Department of Veterans Affairs IG office	Military service IG office
Office refers investigation of whistleblower reprisal complaint originating from a civilian to outside of IG office, such as Office of Special Counsel or independent office	Yes	Yes	Yes	Yes
Office investigates whistleblower reprisal complaint originating from a contractor	Yes	Yes	Yes	No
Office investigates whistleblower reprisal complaint originating from a military member	Yes	N/A	N/A	Yes

Source: GAO analysis of federal agency and military service IG office information. | GAO 22-105316

Handling of Senior Official Investigations

We did not identify any notable differences in the handling of senior official investigations between the federal agency IG offices and military service IG offices we reviewed, as shown in table 8.

Table 8: Comparison of Federal Agency and Military Service Inspector General (IG) Office Handling of Senior Official Investigations

Action IG performs	Department of Health and Human Services IG office	Department of State IG office	Department of Veterans Affairs IG office	Military service IG office
All allegations concerning senior officials will be immediately directed to specialized offices within the IG office	Yes	Yes	Yes	Yes

Source: GAO analysis of federal agency and military service IG office information. | GAO 22-105316

Quality Assurance Reviews

We did not identify any notable differences in the quality assurance process between the federal agency IG offices and military service IG offices we reviewed, as shown in table 9.

**Appendix I: Federal Agency Inspector General
Office Comparisons**

Table 9: Comparison of Federal Agency and Military Service Inspector General (IG) Office Quality Assurance Reviews

Actions IG performs	Department of Health and Human Services IG office	Department of State IG office	Department of Veterans Affairs IG office	Military service IG office
Supervisory review	Yes	Yes	Yes	Yes
Legal review (if appropriate)	Yes	Yes	Yes	Yes
Closed case review	Yes	Yes	Yes	Yes

Source: GAO analysis of federal agency and military service IG office information. | GAO 22-105316

Appendix II: Comments from the Department of the Air Force



Office of the Secretary

DEPARTMENT OF THE AIR FORCE
WASHINGTON DC



29 Aug 22

Ms. Kristen Kociolek
Director, Financial Management and Assurance
U.S. Government Accountability Office
441 G Street, NW
Washington DC 20548

Dear Ms. Kociolek,

This is the Secretary of the Air Force, Office of the Inspector General Office, response to the GAO Draft Report, GAO-22-105316, 'MILITARY INSPECTORS GENERAL: Opportunities Exist to Strengthen Processes for Administrative Investigations and Training,' dated July 28, 2022 (GAO Code 105316). This response specifically addresses the two recommendations of the GAO report made to the Inspector General of the Air Force.

Attached is our response to the subject report. My point of contact is Mr. Matthew R. Bartlett, who can be reached at matthew.bartlett.5@us.af.mil and phone 202-404-5668.

Sincerely,

IAN M. DINESEN, Colonel, USAF
Director, Complaints Resolution

Appendix II: Comments from the Department
of the Air Force



Office of the Secretary

DEPARTMENT OF THE AIR FORCE
WASHINGTON DC



24 Aug 22

MEMORANDUM FOR DIRECTOR, ACQUISITION AND SOURCING MANAGEMENT
U.S. GOVERNMENT ACCOUNTABILITY OFFICE

FROM: Secretary of the Air Force Office of the Inspector General (SAF/IG)
1140 Air Force Pentagon
Washington DC 20330-1140

SUBJECT: SAF/IG Response to GAO Draft Report GAO-22-105316 Recommendations

The Secretary of the Air Force, Office of the Inspector General provides the following responses to the GAO Draft Report GAO-22-105316 Recommendations:

Recommendation 2: *"The Inspector General of the Air Force should revise established policies to require that if a command IG is denied the approval to conduct an IG investigation by the directing authority, the command IG should refer the complaint to the Air Force IG for appropriate action."*

Response: SAF/IG adopted this recommendation and inserted language into the draft AFI 90-301, currently in re-write, such that if an "appointing authority" denies an IG the approval to initiate an IG investigation, the case will be referred to the next level of IG office to make the investigation decision.

Recommendation 6: *"The Inspector General of the Air Force should establish requirements for recurring training that are systematically lined to the requisite knowledge, skills, and abilities throughout an investigator's career progression, and establish a means for tracking this training."*

Response: AFI 90-301, *Inspector General Complaints Resolution*, currently states: "IGs and their IGQ staff will receive refresher training every three years or if returning to the office after being detailed, deployed, or incurring any other break in service, for at least 12 months. Refresher training includes attendance at IGTC-Q or any other SAF/IGQ approved refresher training (e.g. MAJCOM conference, IG DoD course, etc.)." This is consistent with the CIGIE "Quality Standards for Investigations," which states: "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." SAF/IG will incorporate a more robust training tracking system as recommended.

Please let me know if you have any questions on this matter. My POC for this matter is Col Ian Dinesen (202) 404-5262, DSN 754, or by email ian.dinesen@us.af.mil.

DAVIS,STEPHEN.L. Digitally signed by
1076776950 DAVIS,STEPHEN.L. 1076776950
Date: 2022.08.22 10:00:23 -0400

STEPHEN L. DAVIS
Lieutenant General, USAF
The Inspector General

Appendix III: Comments from the United States Marine Corps



DEPARTMENT OF THE NAVY
HEADQUARTERS, UNITED STATES MARINE CORPS
3000 MARINE CORPS PENTAGON
WASHINGTON, DC 20350-3000

IN REPLY REFER TO:

8 Sep 2022

MEMORANDUM FOR GOVERNMENT ACCOUNTABILITY OFFICE

Subj: GOVERNMENT ACCOUNTABILITY OFFICE (GAO) DRAFT REPORT NO.
GAO-22-105316, MILITARY INSPECTORS GENERAL: OPPORTUNITIES EXIST
TO STRENGTHEN PROCESSES FOR ADMINISTRATIVE INVESTIGATIONS AND
TRAINING

Pursuant to your July 28, 2022 draft report, the Marine Corps is providing its implementation plan for recommendation no. 3.

Recommendation 3: The Inspector General of the Marine Corps should revise established policies to require that if a command IG is denied the approval to conduct an IG investigation by the directing authority, the command IG should refer the complaint to the MC IG for appropriate action.

Marine Corps Response: The IGMC concurs with Recommendation 3 and will incorporate the changes into the next update of Marine Corps Order (MCO) 5430.1A w/ Admin Change.

For questions regarding this response, I may be reached at (571) 465-6624 or email charles.dove@usmc.mil and HQMCAuditLiaisons@usmc.mil.

A handwritten signature in black ink, appearing to read "C. K. Dove", is positioned above the typed name.

C. K. DOVE
Head, Audit Coordination and Liaison
Office of the Director, Marine Corps Staff

Appendix IV: Comments from the Department of the Navy



DEPARTMENT OF THE NAVY
NAVAL INSPECTOR GENERAL
1254 9TH STREET SE
WASHINGTON NAVY YARD DC 20374-5006

IN REPLY REFER TO:
7510
Ser IG00B/0277
23 Aug 22

Ms. Kristen Kociolek
Director, Financial Management and Assurance
U.S. Government Accountability Office
441 G Street
NW, Washington, DC 20548

Dear Ms. Kociolek,

This is the Office of the Naval Inspector General (NAVINSGEN) response to the GAO Draft Report, GAO-22-105316, "MILITARY INSPECTORS GENERAL: Opportunities Exist to Strengthen Processes for Administrative Investigations and Training," (GAO Code 105316).

My point of contact for this matter is Ms. Sheila Harris, at (202) 355-5746, or via e-mail at sheila.m.harris12.civ@us.navy.mil.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Donovan".

CATHERINE DONOVAN
Deputy, Naval Inspector General

**Appendix IV: Comments from the Department
of the Navy**

NAVAL INSPECTOR GENERAL COMMENTS
FOR GAO DRAFT REPORT GAO-22-105316

RECOMMENDATION 7: The Inspector General of the Navy should establish requirements for recurring training that are systematically linked to the requisite knowledge, skills, and abilities throughout an investigator's career progression, and establish a means for tracking this training.

NAVINGEN Response:

Under the authority granted in Secretary of the Navy Instruction (SECNAVINST) 5430.57H, Mission and Functions of the Naval Inspector General (NAVIG), NAVIG intends to standardize the NAVIG Enterprise inspector and investigator training and certification processes and will seek accreditation, with a view to making NAVIG certification a condition of employment for all NAVIG Enterprise employees.

NAVIG signed the certification manual (NAVINGEN M-5000.1) on 23 June 2022, which establishes the NAVIG Enterprise professionalization framework program and aligns with the Council of the Inspectors General on Integrity and Efficiency (CIGIE) standards, DoD Office Inspector General guidelines, and positional competencies. All NAVIG Enterprise personnel will meet the CIGIE general standards for qualifications, professional standards, and due professional care standards in addition to those outlined in this manual. **Personnel are required to renew certification every three years.**

In accordance with SECNAVINST 5430.57H, the Certifying Authority is responsible for monitoring and maintaining training records. Professionalization is a developmental continuum where personnel enhance their competencies and skills throughout their entire career. All DON civilian employees will maintain an Individual Development Plan (IDP) that accounts for core competencies and required training to earn advanced certifications. **Supervisors will verify their subordinates maintain a current IDP in training databases, to include Total Workforce Management Services and Fleet Training Management and Planning System, to guide their continuous professional development and highlight training opportunities.**

Appendix V: GAO Contacts and Staff Acknowledgments

GAO Contacts

Kristen Kociolek, (202) 512-2989 or kociolekk@gao.gov

Elizabeth Field, (202) 512-2775 or fielde1@gao.gov

Staff Acknowledgments

In addition to the contacts named above, Margaret Best (Assistant Director), Jonathan Meyer (Assistant Director), Kevin Scott (Auditor in Charge), Megan Jones, John Ledford, Leigh Ann Sheffield, and Vanessa Taja made major contributions to this report. Other key contributors include James Arp, Carl Barden, Marcia Carlsen, Alissa Czyz, Pat Frey, Jason Kirwan, Diana Lee, Amie Lesser, Steven Lozano, Anne Rhodes-Kline, and Anne Thomas.

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