



**Association of Inspectors General**  
**524 West 59<sup>th</sup> Street, 3532N**  
**New York, New York 10018**

October 10, 2019

William Stern  
Inspector General  
Los Angeles Unified School District Office of Inspector General  
333 South Beaudry Avenue  
Los Angeles, CA 90017

Dear Inspector General Stern,

The Association of Inspectors General (AIG) performed a Peer Review of the Los Angeles Unified School District Office of Inspector General (LAUSD OIG) Investigations Unit (IU) at your request. The Peer Review Team (PRT) evaluated the work of the IU covering the last three years (July 1, 2015 through June 30, 2018). The Team performed the review on October 9 and 10, 2019, at your office at 333 South Beaudry Avenue, Los Angeles, California. The PRT assessed the work of the IU for compliance with the AIG Principles and Standards for Offices of Inspector General. Adherence to these standards are referenced in the Reports of Investigation issued by the LAUSD OIG during the review period.

The two-person Peer Review Team consisted of:

Team Leader: Robert Clift  
1<sup>st</sup> Vice President  
Association of Inspectors General

Team Member: Flora Miller, Team Member  
Regional Investigator / Accreditation Manager  
Florida Department of Children and Families Office of Inspector General and Co-Chair, Peer Review Committee, Association of Inspectors General

During our review, we identified several non-compliance issues with the Association's standards that are "fairly likely" to affect or impact the quality of ongoing and future investigations. The major non-compliance issues involve investigative planning and supervision, as well as achieving training expectations required by standards. These observations, which will also include areas of distinction (such as the re-creation and refinement of thoroughly detailed IU procedures and OIG training policies), will be

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detailed later in a separate management letter. There are no limitations or qualifications on our opinion. It is our conclusion that the LAUSD OIG Investigations Unit receive a peer review rating of *Pass with Deficiencies*.

The PRT recognizes that LAUSD OIG's compliance with the Association's standards has been affected by measures beyond its control, including IU staff and OIG leadership turnover. From the stakeholder and staff interviews we conducted and documents we reviewed, we see a supportive "Tone-At-The-Top" with an increased focus on the production of value-added investigative services and products for the OIG's customers.

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

### **Purpose**

The Team conducted an independent, qualitative review of the operations of the IU of the LAUSD OIG focusing on compliance with agreed-upon standards.

### **Scope**

The Peer Review covered IU operations, resulting work products, and related file materials chosen from closed investigations between July 1, 2015 and June 30, 2018. The Peer Review's scope also covered the unit's compliance with their relevant policy and process manuals and procedural guides; staff qualifications; and professional training requirements. Lastly, the Peer Review assessed supervisory review and quality control over the work product, reporting of results, and the LAUSD OIG relationship and communications with outside agencies. For this last step, the PRT met with internal and external stakeholders with whom the LAUSD OIG frequently work, or who are the recipients of the LAUSD OIG IU work products.

### **Method**

The PRT generally followed the Peer Review/Qualitative Assessment Review Checklists for investigations, which are based on AIG Quality Standards. The PRT also called upon their own professional experience as senior managers of various Offices of Inspectors General and through their knowledge of and familiarity with best practices within the Inspector General community.

Prior to the actual on-site review, the PRT requested information from the LAUSD OIG, including but not limited to policy and procedures manuals, closed case logs, a list of issued reports, and a list of external stakeholders. The PRT used this information to select the work products and related case materials that were ultimately reviewed.

On October 9, 2019, the PRT held an entrance conference with you and your IU's leadership team, we explained the Peer Review scope, methodology, limitations, and



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proposed schedule. During that morning, we also delivered our request for sample review materials. The Peer Reviewers conducted their fieldwork through examination of the selected case files and Operations Policy Manual and Continuing Education files. We interviewed staff from IU, including the Deputy Inspector General (DIG), supervisors, Training Coordinator, and available investigators.

All information requests were met fully and timely both before and during this review.

The PRT conducted all interviews without any limitation on scope or time. Reviewers requested follow-up interviews and explanations, as well as any supplemental documentation, and the LAUSD OIG IU staff graciously accommodated the PRT.

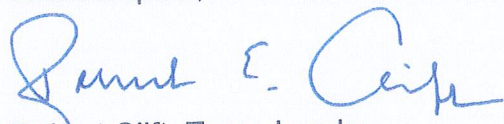
The PRT also independently chose several external stakeholders to interview. Subsequent discussions assessed timeliness and responsiveness of the IU and sufficiency of the IU's work products. Stakeholders included representatives from the:

- LAUSD Board of Education
- LAUSD Personnel Commission
- LAUSD Office of General Counsel
- Los Angeles County District Attorney's Office, Healthcare Fraud Division

Finally, the Team held an exit conference with you and your IU leadership team on October 10, 2019. The PRT provided you with our observations and opinions gathered during the review.

Thank you for the confidence you placed in the Association of Inspectors General by requesting this review. We would like to acknowledge and thank your Peer Review coordinator, Maria Thomas, for her efforts in the coordination of, and planning for, this review. Lastly, we would like to recognize that in all of our interactions with your team, we were shown the courtesy and cooperation that is the hallmark of a professional staff interested in a full and open review of their work.

With Respect,



Robert Cliff, Team Leader  
AIG Peer Review for LAUSD OIG, October 2019  
First Vice President, Association of Inspectors General

cc:

Flora Miller, Team Member  
AIG Peer Review for LAUSD OIG, October 2019  
Peer Review Committee, Association of Inspectors General