



**Department of Energy**  
Washington, DC 20585

**EXTERNAL PEER REVIEW REPORT**

February 15, 2023

Christi A. Grimm, Inspector General  
Department of Health and Human Services

This required external peer review was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Inspection and Evaluation Committee guidance as contained in the CIGIE *Guide for Conducting External Peer Reviews of Inspection and Evaluation Organizations of Federal Offices of Inspector General*, December 2021. The peer review was conducted from October 10, 2022 through January 13, 2023.

Department of Energy, Office of Inspector General (Energy OIG) assessed the extent to which Department of Health and Human Services, Office of Inspector General, Office of Evaluation and Inspections (OEI) complied with the CIGIE *Quality Standards for Inspection and Evaluation*, December 2020 (Blue Book). This assessment included a review of OEI's internal policies and procedures documented in the OEI Procedures Manual, October 3, 2022 implementing the Blue Book standards. It also included a review of selected inspection and evaluation reports issued from October 1, 2021 through September 30, 2022 to determine whether the reports complied with the Blue Book standards and OEI's internal policies and procedures.

**Overall Conclusion**

Energy OIG determined that OEI's policies and procedures generally were consistent with the Blue Book standards addressed in the external peer review. Of the four reports reviewed, all four generally complied with the Blue Book standards.

The Department of Health and Human Services OIG management officials provided a response to our Peer Review Report (Enclosure 2).

A handwritten signature in cursive script, reading "Teri L. Donaldson", is located below the text.

Teri L. Donaldson  
Department of Energy Inspector General

Enclosures  
As stated

## **ENCLOSURE 1: Scope and Methodology**

Department of Energy, Office of Inspector General (Energy OIG) selected the following four reports for review. Energy OIG selected fiscal year 2022 reports issued under Department of Health and Human Services, Office of Inspector General, Office of Evaluation and Inspections (OEI) subject to the CIGIE *Quality Standards for Inspection and Evaluation*, December 2020 (Blue Book).

1. *More Than One-Third of Medicaid-Enrolled Children in Five States Did Not Receive Required Blood Lead Screening Tests*, October 18, 2021, OEI-07-18-00371
2. *Medicare Part B Drug Payments, Impact of Price Substitutions Based on 2020 Average Sales Prices*, September 23, 2022, OEI-03-22-00170
3. *Medicare Telehealth Services During the First Year of the Pandemic: Program Integrity Risks*, September 2, 2022, OEI-02-20-00720
4. *Medicare and Beneficiaries Pay More for Preadmission Services at Affiliated Hospitals than at Wholly-owned Settings*, December 27, 2021, OEI-05-19-00380

Energy OIG conducted an entrance conference on October 10, 2022. OEI provided copies of project files and any requested documentation. For all reviewed reports, Energy OIG virtually met with OEI inspection team members to discuss data collection and analysis methods. While Energy OIG did not test OEI's methods, we gained an understanding of the methods and determined that OEI's conclusions based on data were accurate. Because OEI's prior external peer review report did not contain recommendations, such review was not necessary. We concluded the peer review with an exit conference on January 20, 2023.

**ENCLOSURE 2: Department of Health and Human Services Office of Inspector General Comments to Draft Peer Review Report**



DEPARTMENT OF HEALTH AND HUMAN SERVICES

**OFFICE OF INSPECTOR GENERAL**

WASHINGTON, DC 20201



February 15, 2023

The Honorable Teri L. Donaldson  
Inspector General  
Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585

Dear Inspector General Donaldson:

Thank you for the opportunity to comment on the external peer review draft report on the Department of Health and Human Services, Office of Inspector General, based on guidance from the Council of the Inspectors General on Integrity and Efficiency Inspection and Evaluation Committee. Department of Energy, Office of Inspector General (Energy OIG) concluded in its report that the policies and procedures of our Office of Evaluation and Inspections were generally consistent with Blue Book standards, and that all the reports reviewed generally complied with Blue Book standards.

We wish to express our sincere appreciation for the professionalism and thoroughness demonstrated by the Energy OIG team while conducting its review. If you have any questions, please contact Ann Maxwell, Deputy Inspector General for Evaluation and Inspections, at [Ann.Maxwell@oig.hhs.gov](mailto:Ann.Maxwell@oig.hhs.gov) or (202) 619-2482.

Sincerely,

A handwritten signature in black ink, reading "Christi A. Grimm".

Christi A. Grimm  
Inspector General

## **ADDENDUM**

### **Additional Information Related to Disposition of Review Documentation**

When requests or legal demands for peer review documents are received by the Reviewing OIG, the Reviewing OIG is responsible for coordinating and responding to the requester. The Reviewing OIG will consider the documents it received from the Reviewed Organization to be within the Reviewed Organization's possession and control.

For requests or legal demands received by the Reviewed Organization for peer review documents, the Reviewed Organization will consider the documents it provided to the Reviewing OIG to still be within the Reviewed Organization's possession and control. If, as part of its efforts to respond to such requests or legal demands, the Reviewed Organization needs access to any documents that it provided to the Reviewing OIG, the Reviewed Organization will be given access, on its request, to the documents and may review and/or copy the documents (or, if agreed on by the parties, the Reviewing OIG will make copies of the documents and provide those copies to the Reviewed Organization).

For requests under the FOIA (5 U.S.C. 552), the Reviewing OIG will:

- a. provide documents supplied by the Reviewed Organization to the Reviewed Organization for response directly to the requester; and
- b. consult with the Reviewed Organization regarding the Reviewed Organization's information contained in documents generated by the Reviewing OIG and obtain the Reviewed Organization's disclosure recommendations and legal basis therefor relative to such information, provided that the Reviewing OIG (or, where applicable, the Reviewing OIG's FOIA release authority) has final say as to the response to the FOIA requester.

In all cases, the Reviewed Organization and Reviewing OIG will comply with statutory provisions; regulations; if applicable, implementing guidance from the Reviewed Organization's FOIA release authority; and applicable case law and authorities in determining the response to the FOIA request.

For discovery demands under the applicable rules of civil procedure or similar legal process and other legal authorities—to include subpoenas—for some or all of the peer review documents, the Reviewing OIG will advise the Reviewed Organization of the existence of such demands and will advise the litigating parties or adjudicative body that some or all of the requested documents being sought belong to the Reviewed Organization. The Reviewed Organization will have the responsibility to:

- a. advise the Reviewing OIG on whether or under what circumstances to produce the documents being sought; or
- b. intervene or otherwise communicate with the litigating parties or adjudicative body regarding the production of such documents or the obtaining of protective orders or the equivalent, as permitted under applicable law.

For requests from oversight bodies, such as the Government Accountability Office or reviewing bodies empowered to examine peer reviewing entities, the Reviewing OIG will advise the Reviewed

Organization of the existence of such request and will advise the oversight body that some or all of the requested documents belong to the Reviewed Organization. The Reviewed Organization will have the responsibility to:

- a. advise the Reviewing OIG on whether or under what circumstances to provide the requested documents; or
- b. communicate with the oversight body regarding the requested documentation.