

LOS ANGELES POLICE COMMISSION

**REVIEW OF THE DEPARTMENT'S
GANG ENFORCEMENT DETAIL
COMMAND ACCOUNTABILITY
PERFORMANCE AUDITS**



Conducted by the

OFFICE OF THE INSPECTOR GENERAL

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PURPOSE

The Office of the Inspector General (OIG), in accordance with the Transition Agreement and pursuant to its Audit and Review Plan, has completed its first meta-audit review of the Los Angeles Police Department's (Department) Gang Enforcement Detail (GED) Command Accountability Performance Audits (CAPAs). This OIG review assessed the CAPAs' completeness, quality and findings, with respect to supervisory oversight of the Department's GED units.

BACKGROUND

The Department entered into a Transition Agreement with the United States Department of Justice, effective July 20, 2009. The Transition Agreement focuses on four specific areas: gang units, financial disclosure, bias policing and the Training Evaluation and Management System II (TEAMS II). Pursuant to the Transition Agreement, "the City Defendants, through the OIG and in consultation with the United States [Department of Justice], shall implement the recommendations of the Monitor as set forth on page [83] of the Monitor's Final Report." These recommendations provide, in relevant part:

The Monitor encourages the Department to continue its focus on achieving appropriate and consistent supervisory oversight of the gang units. This includes supervisory oversight of Arrest Reports, search warrants, uses of force, confidential informants, daily operations, field presence and tactical plans, and the utilization of the TEAMS II early warning system. The Monitor also recommends that the Department and the OIG continue to closely audit, review and monitor gang supervision, as they currently do in their CAPAs and Consent Decree related audits, and to assist the Department in resolving [the] issues identified.

Internal Audits and Inspections Division (IAID) completed a total of 46 GED CAPAs from January 2005 through December 15, 2009. These CAPAs are conducted by a specialized audit section within IAID comprised of nine sworn and civilian employees, headed by a Detective III. The purpose of a CAPA, as stated by IAID is its CAPA reports, is "to provide useful information to Department management related to an Area/bureau GED Work Product, supervision, gang intelligence gathering, criminal complaint process, and case categorization."

CAPA audits completed by IAID in 2009 had the following five objectives and 17 topics:

<i>Objectives</i>	<i>Topics</i>
Evaluation of:	
1. Work Product	Arrest Reports, Search Warrants
2. Supervisory Roles – Approvals, Feedback & Reviews	Detention Logs, Daily Field Activity Reports, GED – Supervisor's Daily Reports, Performance Evaluations, Arrest Reports, Search Warrants, Non-Categorical Use of Force (NCUOF) Investigations
3. Gang Intelligence Information	Cal Gang Database, Contact Cards, Gang History Books, Gang Photograph Books
4. The Criminal Complaint Process	Supervisory Bypasses, Releases from Custody
5. Case Categorization	Category 1 (most serious and solvable), Category 2 (other)

REVIEW METHODOLOGY AND SCOPE

Following the aforementioned recommendations of the Monitor, the OIG reviewed all five GED CAPAs completed by IAID during the period of January 1, 2009 through December 15, 2009. This was done to assure “appropriate and consistent supervisory oversight of the [Department's] gang units” with respect to certain reports and use of force investigations. The Area CAPAs completed included Southeast, Foothill, 77th Street, Newton and Northeast.

To determine the adequacy of the supervisory oversight, the OIG reviewed three CAPA objectives: Criminal Complaints, Work Product and Supervisory Roles. To accomplish an analysis of these five objectives, the OIG selected the following seven CAPA topics for review: Arrest Packages, Search Warrants, Detention Logs, GED Supervisor's Daily Reports, Performance Evaluations, NCUOF Investigations and Supervisory Bypasses (felony arrests downgraded to misdemeanors, discussed in more detail later in this report). The table below summarizes the compliance rates reported by IAID, per CAPA, for each of the seven topics.

<i>CAPA Topic</i>	<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>
Arrest Reports	91%	100%	91%	94%	82%
Search Warrants	100%	0% ¹	100%	100%	Not Applicable
Detention Logs	98%	100%	94%	100%	100%
GED Supervisor's Daily Reports					
1. Documented mission and activities	100%	100%	100%	100%	100%
2. Report contained signature of C/O	100%	100%	100%	81%	100%
Performance Evaluations					
1. Contained most recent evaluation	98%	100%	79%	79%	100%
2. Narratives unique to employee	100%	100%	79%	100%	100%
NCUOF Investigations	100%	Not Applicable	100%	100%	100%
Supervisory Bypasses	Not Applicable	Not Applicable	100%	Not Applicable	0% ¹

Note: “Not Applicable” means there was no applicable work product in the Deployment Period (DP) tested.

¹ The one applicable Foothill search warrant audited was held out of compliance, and both of the two Northeast supervisory bypasses audited were deemed by IAID to be non-compliant.

In regard to the seven selected CAPA topics, the IAID audit reported on the total population of 695 packages/reports for the DP tested.² From these 695 packages, the OIG selected 160 packages for its meta-audit sub-samples. With respect to topics for which IAID tested more than ten packages, the OIG randomly selected and reviewed sub-samples, with the sub-sample sizes calculated based on a 95% confidence level, an expected error rate of 6% and a plus-precision of 6%. However, for topics for which IAID tested less than ten packages, the OIG reviewed the entire population.

The table below shows the total packages/reports audited by IAID for each topic for each CAPA, and the total sub-sample of packages reviewed by the OIG for each topic.

Table No. 2 – Total Packages/Reports Audited by IAID and Reviewed by the OIG

<i>CAPA Topic</i>	<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total IAID</i>	<i>Total OIG</i>
<i>Deployment Period</i>	<i>12-2008</i>	<i>2-2009</i>	<i>2-2009</i>	<i>4-2009</i>	<i>4-2009</i>		
Arrest Reports	53	18	66	31	22	190	35
Search Warrants	6	1	1	2	0	10	10
Detention Logs	51	14	67	25	21	178	35
GED Supervisor's Daily Reports	32	20	26	21	39	138	33
Performance Evaluations	43	17	44	34	30	168	35
NCUOF Investigations	2	0	1	0	0	3	3
Supervisory Bypasses	0	0	3	3	2	8	8
<i>Totals</i>	128	51	141	83	114	695	160

The OIG conducted this review in accordance with generally accepted government auditing standards. These standards require that the review be adequately planned, performed and supervised, and that sufficient, appropriate evidence be examined to provide a reasonable basis for the results and conclusion.

REVIEW OBJECTIVES

The OIG reviewed the audit work associated with each of the seven selected topics in the five CAPAs for completeness, quality and findings as follows:

Completeness

- Determine if each CAPA tested and reported a compliance rate for each topic.
- Determine if the CAPA samples for each topic were selected from complete populations.

Quality

- Determine if appropriate CAPA sampling methodologies and testing questions were used for each topic.
- Determine if there was evidence of supervisory review for each topic.
- Determine if the CAPAs completely and accurately reported the purpose, methodology, objectives and results for each topic.

² For example, for Southeast Area, all 53 GED arrest packages for DP 12-2008 were tested.

Findings

- Determine if the reported findings for each topic correctly represented significant instances in which compliance was not achieved.
- Determine if there were any additional findings not reported that represented significant instances in which compliance was not achieved.

OVERALL REVIEW RESULTS

Completeness

The OIG determined that each CAPA tested and reported a compliance rate for each topic, and the CAPA samples for each topic were selected from complete populations. Hence, the auditing and reporting associated with each topic met the OIG's standard for completeness.

Quality

The OIG determined that appropriate CAPA sampling methodologies and testing questions were used for each topic, and there was evidence of supervisory review for each topic. Also, the CAPAs completely and accurately reported the purpose, methodology, objectives and results for each topic. Hence, the auditing and reporting associated with each topic met the OIG's standard for quality.

Findings

The OIG reviewed 160 of the 695 work products evaluated by IAID and generally determined that the reported findings for each topic correctly represented significant instances in which compliance was not achieved, and there were no additional findings not reported that represented significant instances in which compliance was not achieved. The OIG noted one potential search and seizure issue not identified by IAID in their audit of Arrest Reports. However, based on the totality of their work product, the auditing and reporting associated with each topic met the OIG's standard for quality.

ARREST REPORTS

CAPAs' Scope and Reported Compliance Rates

IAID reviewed 190 arrest reports in conducting its audit. Each Arrest Report was tested for compliance with Department policies and procedures (including the admonition of *Miranda* rights) and to determine if there was adequate articulation of the legal basis for the involved police actions (e.g., detentions, arrests, and searches). IAID's reported compliance rates were as follows:

<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total</i>
91%	100%	91%	94%	82%	91%
(48/53)	(18/18)	(60/66)	(29/31)	(18/22)	(173/190)

OIG Review Methodology

The OIG reviewed the audit testing associated with Arrest Reports in the five CAPAs for completeness, quality, and findings, as previously described. The OIG selected and reviewed a

sub-sample of 35 Arrest Reports of the 190 audited by IAID. This sub-sample was randomly selected and calculated based on a 95% confidence level, an expected error rate of 6% and a plus-precision rate of 6%. The OIG re-performed the highest-risk tests completed by IAID, answering the following 20 questions for each Arrest Report:

1. Was the Arrest Report face sheet and related narrative, and Booking Approval properly completed?
2. Was the Arrest Report properly approved?
3. Was the Booking Approval properly approved by a watch commander?
4. Was reasonable suspicion for the detention of each arrestee adequately articulated?
5. Was probable cause the arrest of each arrestee adequately articulated?
6. Was each arrestee properly advised of his/her *Miranda* rights, with this documented?
7. Was the arrestee transported to the Area station, not to an off-site location?
8. Did the watch commander inspect and interview the arrestee?
9. If the arrestee required medical treatment, was medical treatment provided?
10. Was there a legal basis to conduct each search and was it documented?
11. Was there a legal basis to seize each item of evidence/property from the arrestee?
12. Does all pertinent/relevant information reconcile between the Arrest Report, Property Report and Receipt for Property Taken Into Custody?
13. Are there any indications that the arrestee consented to the search?
14. Was on-scene supervision, if applicable, adequate?
15. If the arrestee was a juvenile, was a Juvenile Arrest Supplemental Report completed?
16. If the arrestee was a juvenile, were the parents/guardians notified?
17. If this arrestee was a juvenile, was he/she logged on the correct Juvenile Detention Log?
18. Was probable cause to arrest based on this arrestee resisting arrest, assaulting, or interfering with the officer (Penal Code 70b event)?
19. For multi-arrests only, were there no issues regarding authenticity, supervisory oversight, or conformance with Department policy?
20. Apart from the above 19 tests, were there no any other issues regarding legality, authenticity, supervisory oversight, or conformance with Department policy?

OIG Review Results

The OIG determined that the audit tests associated with Arrest Reports met the OIG's standard for completeness, quality and findings. However, the OIG identified a potential search and seizure violation, which was not reported by IAID:

Northeast Area CAPA – District Reporting (DR) No. 09-1109945

In April 2009, two officers assigned to Northeast Area GED responded to a shots heard call, but were unable to locate “any [suspects], [witnesses], or evidence during the incident.” Subsequent to the shots heard call, several other officers assigned to Northeast Area GED responded to a separate shooting incident, but were unable to locate the suspects responsible for the gunfire. The following day, the two officers who had responded to the shots heard call conducted “extra patrol” to monitor the activities of a local street gang. As the officers patrolled the area, they observed two individuals standing near a parked car. When one of these individuals ran from the officers, the officers exited their police car and detained the second individual (Suspect 1).

According to the Arrest Report, the reason for Suspect 1's detention was "pending a criminal gang injunction violation, gang activity, [suspect's] flight, and a man with a possible gun investigation based on prior knowledge of gang violence, shootings ... within the [gang name] area." The officers then searched Suspect 1 and recovered a handgun from his front pocket.

The OIG believes that the justification articulated by the officers for the detention of Suspect 1 did not meet the applicable legal standard of reasonable suspicion. The law provides that an officer may detain a person when there are specific and articulable facts to cause him to believe that (1) some activity out of the ordinary had taken place or was occurring or about to occur, (2) the activity was related to a crime, and (3) the individual under suspicion was connected to that activity.³ Although the court will consider the totality of the circumstances when determining the presence of reasonable suspicion, the detaining officers must have a particularized and objective basis for believing the person detained is involved in criminal activity. "An investigative stop or detention predicated on circumstances which, when viewed objectively, support a mere curiosity or hunch is unlawful, even though the officer may be acting in good faith."⁴

Here, although the Arrest Report described two shooting incidents that occurred the previous day, it did not identify the suspect(s) who were responsible for discharging their weapons or provide the officers with an adequate basis to believe that Suspect 1 was involved in either shooting incident. The officers' detained Suspect 1 "pending a criminal gang injunction violation, gang activity, [suspect] flight, and a man with a possible gun investigation;" however, the facts articulated by the officers in the Arrest Report do not reasonably support a detention. First, there is no evidence that Suspect 1 was a gang member or that he was subject to a gang injunction. The Arrest Report did not describe the manner in which he was dressed or other information to support Suspect 1's possible gang membership or affiliation. Second, the officers did not articulate the outline of a gun in Suspect 1's pocket or provide a basis, independent of the prior day's shootings, to believe that Suspect 1 was armed with a gun or posed a threat to officer safety. Third, a parked car with its doors open is not, in and of its self, evidence of criminal activity.

Based on a strict reading of the Arrest Report, the officers did not extract criminality from Suspect 1's presence near the parked car. In fact, it does not appear that the officers believed criminal activity was afoot until Suspect 1's companion fled, prompting them to detain Suspect 1 for the reasons noted above. Although Suspect 1 walked towards the gate of a nearby residence soon after his companion fled on foot, the Arrest Report did not indicate that he walked towards the gate in an attempt to evade capture. In the cases in which the issue of flight was addressed by the court, it noted that neither nervousness nor walking away from the police provides a reasonable basis for an investigative detention. In *United States v. Chavez-Valenzuela*, the court noted the police do not have reasonable suspicion to conduct an investigative stop of individuals who walk away because "the ... activity [is] no different from the activity of other pedestrians in the neighborhood."⁵ The court further noted "no circuit [court] has held that nervousness alone

³ *People vs. Bower*, 24 Cal. 3d 638, 644 (1979).

⁴ *People v Conway*, 25 Cal. App. 4th 385, 389 (1994).

⁵ *United States v. Chavez-Valenzuela*, 268 F.3d 719 (2001).

suffices to create reasonable suspicion.”⁶ Similarly, in *Moreno v. Baca*, the court noted that “walking away from the police hardly amounts to headlong flight ... and would not give rise to reasonable suspicion by itself, even in a high crime area.”⁷ As such, nothing Suspect 1 did was “so unusual, so far removed from everyday experience that it crie[d] out for [an] investigation.”⁸

SEARCH WARRANTS

CAPAs' Scope and Reported Compliance Rates

IAID reviewed ten search warrant packages in conducting its audit. IAID evaluated each search warrant package for compliance with Department policies and procedures. IAID's reported compliance rates were as follows:

<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total</i>
100%	0%	100%	100%	Not Applicable	90%
(6/6)	(0/1)	(1/1)	(2/2)	(0/0)	(9/10)

OIG Review Methodology

The OIG reviewed the audit testing associated with search warrant packages in the five CAPAs for completeness, quality, and findings, as previously described. The OIG reviewed all ten search warrant packages audited by IAID. The OIG re-performed the same tests completed by IAID, answering the following nine questions for each search warrant:

1. Did a magistrate approve the warrant prior to service?
2. Was the warrant was properly entered onto the warrant tracking log?
3. Was the warrant was served within the allotted time?
4. Was the Area commanding officer (or in his/her absence, a lieutenant or higher ranking officer) present during the warrant's service?
5. Was the Return of Service and Warrant Service/Tactical Plan Report completed properly and timely?
6. Was all use of the confidential informant proper?
7. Was there consistency between the evidence seized and the description of the property to be seized on the search warrant, and does all evidence appear to be legally seized?
8. Did a supervisor review and approve the tactical plan for executing the search warrant?
9. Did a supervisor review and approve the debriefing portion of the Warrant Tactical Plan after execution of the search warrant?

⁶ *United States v. Chavez-Valenzuela*, 268 F.3d 719 (2001).

⁷ *Moreno v. Baca*, 400 F.3d 1152, 1168-69 (2005); see *Illinois v. Wardlow*, 528 U.S. 119, 125, 145 L. Ed. 2d 570, 120 S. Ct. 673 (2000).

⁸ *People v. Foranyic*, 64 Cal. App. 4th 186, 190 (1998).

OIG Review Results

The OIG determined that the audit tests associated with search warrant packages met the OIG's standard for completeness, quality and findings.

REVIEW OF DETENTION LOGS

CAPAs' Scope and Reported Compliance Rates

IAID reviewed 178 arrestees requiring Detention Log entries in conducting its audit. IAID evaluated the Detention Log entries for each arrestee for compliance with Department policies and procedures. IAID's reported compliance rates were as follows:

<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total</i>
98%	100%	94%	100%	100%	97%
(50/51)	(14/14)	(63/67)	(25/25)	(21/21)	(173/178)

OIG Review Methodology

The OIG reviewed the audit testing associated with Detention Logs in the five CAPAs for completeness, quality, and findings, as previously described. The OIG selected and reviewed a sub-sample of 35 arrestees of the 178 audited by IAID requiring Detention Log entries. This sub-sample was randomly selected and calculated based on a 95% confidence level, an expected error rate of 6% and a plus-precision rate of 6%. The OIG re-performed the same tests completed by IAID, answering the following three questions for each arrestee:

1. Did the Detention Log for this arrestee indicate that the watch commander inspection and interview boxes were checked?
2. Based on the results of the inspection, did the watch commander take appropriate action?
3. Does the Detention Log for this arrestee/juvenile include the name of the watch commander or his designee in the "Watch Commander's Signature" box?

OIG Review Results

The OIG determined that the audit testing associated with Detention Logs met the OIG's standard for completeness, quality and findings.

GED SUPERVISOR'S DAILY REPORTS

CAPAs' Scope and Reported Compliance Rates

IAID reviewed 138 GED Supervisor's Daily Reports in conducting its audit. IAID evaluated each GED Supervisor's Daily Report for the following two objectives: (1) to determine if the Report documented the mission and activities, and (2) to determine if the Report contained the signature of the commanding officer. IAID's reported compliance rates for Objectives 1 and 2 were as follows:

<i>Objective</i>	<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total</i>
1	100% (32/32)	100% (20/20)	100% (26/26)	100% (21/21)	100% (39/39)	100% (138/138)
2	100% (32/32)	100% (20/20)	100% (26/26)	81% (17/21)	100% (39/39)	97% (134/138)

OIG Review Methodology

The OIG reviewed the audit testing associated with GED Supervisor's Daily Reports in the five CAPAs for completeness, quality, and findings, as previously described. The OIG selected and reviewed a sub-sample of 33 GED Supervisor's Daily Reports of the 138 audited by IAID. This sub-sample was randomly selected and calculated based on a 95% confidence level, an expected error rate of 6% and a plus-precision rate of 6%. The OIG tested for the aforementioned two audit objectives.

OIG Review Results

The OIG determined that the audit testing associated with GED Supervisor's Daily Reports met the OIG's standard for completeness, quality and findings.

PERFORMANCE EVALUATIONS

CAPAs' Scope and Reported Compliance Rates

IAID reviewed 168 GED employee performance evaluations in conducting its audit. IAID evaluated each annual performance evaluation for two objectives: (1) to determine if a current completed performance evaluation report (PER) or standards based assessment form (SBA) was on file, and (2) to determine if the applicable PER/SBA on file contained narratives unique to the employee (i.e., not canned language).⁹ IAID's reported compliance rates for Objectives 1 and 2 were as follows:

<i>Objective</i>	<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total</i>
1	98% (42/43)	100% (17/17)	79% (35/44)	79% (27/34)	100% (30/30)	85% (151/168)
2	100% (43/43)	100% (17/17)	79% (35/44)	100% (34/34)	100% (30/30)	95% (159/168)

OIG Review Methodology

The OIG reviewed the audit testing associated with performance evaluations for completeness, quality, and findings, as previously described. The OIG selected and reviewed a sub-sample of 35 annual PER/SBAs. This sub-sample was randomly selected and calculated based on a 95% confidence level, an expected error rate of 6% and a plus-precision rate of 6%. The OIG tested for the aforementioned two audit objectives.

OIG Review Results

The OIG determined that the audit testing associated with performance evaluations met the OIG's standard for completeness, quality and findings.

⁹ The standards based assessment form replaced the performance evaluation form in January 2009.

NON-CATEGORICAL USE OF FORCE (NCUOF) INVESTIGATIONS

CAPAs’ Scope and Reported Compliance Rates

IAID reviewed three NCUOF investigations in conducting its audit. IAID evaluated the NCUOF investigations for compliance with Department policies and procedures. IAID’s reported compliance rates were as follows:

<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total</i>
100%	not applicable	100%	not applicable	not applicable	100%
(2/2)	(0/0)	(1/1)	(0/0)	(0/0)	(3/3)

OIG Review Methodology

The OIG reviewed the audit testing associated with NCUOF investigations in the five CAPAs for completeness, quality, and findings, as previously described. The OIG reviewed all three NCUOF investigations audited by IAID. The OIG re-performed the same tests completed by IAID by utilizing a matrix comprised of 50 questions.

OIG Review Results

The OIG determined that the audit testing associated with NCUOF investigations met the OIG’s standard for completeness, quality and findings.

SUPERVISORY BYPASSES

General Background

A supervisory bypass, pursuant to section 17(b)(4) of the California Penal Code, allows a detective supervisor to forward an arrest report package, in a case which the supervisor is requesting a misdemeanor case filing, directly to the City Attorney’s Office for arrests in which the suspect is not on probation or parole, not a repeat offender, or where additional investigation would not enable detectives to seek a felony complaint.

CAPAs’ Scope and Reported Compliance Rates

IAID reviewed eight supervisory bypasses in conducting its audit. IAID evaluated the supervisory bypasses for compliance with Department policies and procedures. IAID’s reported compliance rates were as follows:

<i>Southeast</i>	<i>Foothill</i>	<i>77th St.</i>	<i>Newton</i>	<i>Northeast</i>	<i>Total</i>
not applicable	not applicable	100%	100%	0%	75%
(0/0)	(0/0)	(3/3)	(3/3)	(0/2)	(6/8)

OIG Review Methodology

The OIG reviewed the audit testing associated with supervisory bypasses in the five CAPAs for completeness, quality, and findings, as previously described. The OIG reviewed all eight

supervisory bypasses audited by IAID. The OIG re-performed the same tests completed by IAID, answering the following five questions for each supervisory bypass:

1. Was the crime an alternate felony/misdemeanor offense?
2. Did the arrest involve only bypassable booking charges?
3. Was the supervisory bypass appropriate based on Department policy?
4. Was the arrest that was bypassed appropriate based upon review of the arrestee's prior record, the severity of the crime, and the probability of continued criminal conduct?
5. Was the arrestee not a documented gang member as defined by Penal Code 186.22(f)?

OIG Review Results

The OIG determined that the audit testing associated with supervisory bypasses met the OIG's standard for completeness, quality and findings.

RECOMMENDATIONS

There are no recommendations for this report.

MANAGEMENT'S RESPONSE

IAID management agrees that the arrest report could have been better articulated. However, there were enough articulated facts to support the detention and pat-down search, which resulted in the discovery of an unregistered and loaded handgun on the suspect.

CONCLUSION

The OIG concluded that the Department's CAPA audit and the associated report packages met the OIG's standard for completeness, quality and findings. This conclusion was supported by the OIG's detailed review of each of the three audit objectives and their associated topics.