



# **Pandemic Response Accountability Committee**

## **Agile Products Toolkit**



## AGILE PRODUCTS TOOLKIT

### PURPOSE

To aid federal Offices of Inspectors General (OIGs), state, and local agencies that conduct quick reviews as part of their duties to provide expeditious oversight of federal funds. The guidelines laid out in this toolkit pertain to reviews related not only to the effects of the coronavirus disease 2019 (COVID-19) on federal operations (e.g., Coronavirus Aid, Relief, and Economic Security Act expenditures), but also to reviews of other emergent or ongoing challenges external to COVID-19, such as threats to health, safety, and the environment. Designed specifically for senior management and Congressional stakeholders responsible for the oversight of taxpayer funds, this toolkit includes a set of guidelines, best practices, and lessons learned to help conduct, complete, and issue reports or other products expeditiously.

### DISCLAIMER

Emergent issues requiring a rapid response, per OIG discretion and/or as deemed appropriate based on individual circumstances, may also involve full audits, inspections, or evaluations. These will follow all applicable standards as well as all relevant OIG-specific policy and guidance and are not covered within this Agile Products Toolkit.

## EXECUTIVE SUMMARY

The broad scope and elevated urgency of federal agencies' responses to the COVID-19 pandemic presents inherent risks to project and funding management. Specifically, the formal and deliberative processes with which federal agencies plan, fund, authorize, and execute projects conflicts with the speed necessary for a federal pandemic response the American public needs. **Agencies must continue to implement internal controls necessary to prudently plan the awarding and managing of contracts, grants, loans, and other forms of assistance, while also balancing the need to quickly identify and mitigate risks of fraud, waste, abuse, and improper payments.** The American public and Congress have expressed a desire for more expedient and transparent oversight from OIGs, which has only intensified given the challenges brought on by the COVID-19 pandemic. While some OIGs maintain longstanding guidance, others have recently developed guidance regarding the issuance of "agile products." This toolkit focuses on such agile products to help agency management and other key stakeholders increase transparency around emergent concerns, such as the disbursement of federal funds.





## **Contents**

- 1 Introduction**
- 1 What is an Agile Product?**
- 2 What Standards are Required?**
- 5 When Should I Use an Agile Product?**
- 13 Can Agile Products Include Recommendations?**
- 13 What Key Principles Should I Follow?**
- 17 Appendix A: Objective and Approach**
- 19 Appendix B: Review Techniques to Consider when Doing an Agile Product Related to the Pandemic Response**



## Introduction

The Coronavirus Aid, Relief, and Economic Security (CARES) Act and other related legislation provided approximately \$2.6 trillion in federal spending to address the public health and economic crises resulting from the COVID-19 pandemic. Since these funds require the use of grants and loans to disburse large amounts of funds quickly, they not only require a significant amount of attention and support from federal agencies, they are also at high risk of fraud and misuse.

To address these concerns, the CARES Act appropriated supplemental funds to OIGs to promote transparency and conduct oversight of the covered funds and agencies' COVID-19 pandemic response. OIGs are expected to (1) ensure funds are used effectively and efficiently and (2) prevent and detect fraud, waste, abuse, and mismanagement. As a part of these responsibilities, OIGs must conduct their work in accordance with generally accepted government auditing standards or other professional standards as well as inspection and evaluation standards. **Unique to the pandemic response environment, OIGs**

**also have a duty to provide policymakers and the public with expeditious reporting of potential risks and management concerns.**

Agile products such as flash reports and other special bulletins can be used to meet this need if they also comply with key aspects of OIG professional standards, such as independence, due professional care, and quality assurance. This toolkit is intended to give OIGs and other oversight offices guidance to help prepare these types of reports for CARES Act oversight and beyond.

## What is an Agile Product?

Agile products can come in many forms depending on agency guidance or expectations. Primarily, **agile products highlight issues requiring immediate action for oversight officials or Congressional stakeholders and others who have requested reviews of high-risk areas.** Additionally, agile products can inform, without requiring actions, by providing transparency and ensuring key agency leadership, affected stakeholders, and the public have access to information more quickly.



## What Standards are Required for Agile Products?

Incorporating agile project management principles into how your office conducts its work allows you to issue products more quickly, be more adaptable to changes, and focus on the essential work required to issue products—all of which helps your office prevent and root out waste, fraud, and abuse during a pandemic or an emergency. For products issued using agile principles (i.e., agile products), your office may choose to follow, but are not required to follow all Government Auditing Standards (e.g., the Yellow Book or GAGAS) or CIGIE’s *Quality Standards for Inspections and Evaluations* (e.g., the Blue Book). If the agile product does not follow Yellow or Blue Book standards, your office should follow CIGIE’s *Quality Standards for Federal Offices of Inspector General*, or the Silver Book. For all agile products, it is recommended the product include a standards policy statement indicating the standards under which the report was issued and that the work adheres to the professional standards of independence, due professional care, and quality assurance and followed procedures to ensure accuracy of the information presented.

The following sections provide more detail about the professional standards of independence, due professional care, and quality assurance, which are vital to ensuring the integrity of the work performed and aid in securing the public trust and confidence of the oversight agency. It is noted that these professional standards must be present in all work conducted by OIGs.

### Independence

In general, oversight professionals should be free from personal, external, and organizational impairments to independence both in fact and appearance, such that an informed third party would conclude the professional proves capable of exercising objective and impartial judgment on all issues being reported. Oversight professionals and their oversight agencies must maintain their independence, so their opinions, findings, conclusions, judgments, and recommendations remain impartial and are viewed as impartial by others. Given the nature of agile reporting, special attention and new processes may be necessary to ensure independence related to undue influence, bias, and management participation.



Oversight agencies should establish standard processes to identify and evaluate threats to independence and apply safeguards to reduce those threats and maintain the integrity of their agile products.

## THREATS TO INDEPENDENCE



### (1) Undue Influence

The threat of external pressures affecting an oversight professional's ability to make independent and objective judgments.



### (2) Bias

The threat that an oversight professional will, because of political, ideological, social, or other convictions, take a position that is not objective.



### (3) Management Participation

The threat resulting from an oversight professional taking on the role of management or otherwise performing management functions on behalf of the agency or entity, which will lead the professional to take a position that is not objective.



## Due Professional Care

Oversight professionals should conduct reporting with due professional care. This requires acting with integrity, exercising objectivity, and maintaining professional skepticism. Professional skepticism requires keeping an eye out for evidence that contradicts other evidence obtained or for any information that brings into question the reliability of evidentiary support. It also involves a mindset in which professionals do not assume management is dishonest.

Due professional care ensures the oversight team members collectively possess the professional knowledge, skills, and abilities; and in good faith and with integrity, are capable of diligently gathering information and objectively evaluating the sufficiency and appropriateness of evidence.

## Quality Assurance

Oversight agencies should have appropriate quality assurance controls in place to provide reasonable assurances their reports are accurate and supported by evidence. The quality assurance process should ensure statements of facts, figures, and dates are correctly reported; the findings are adequately supported by the evidence; and if applicable, recommended or required actions flow logically from the evidence. See [What Key Principles Should I Follow?](#) below for more suggestions related to ensuring sufficient quality assurance for agile products.



## When Should I Use an Agile Product?

Based on our outreach to the OIG community ([Appendix A: Objective and Approach](#)), we identified four primary situations in which an agile product may be used by your office: Urgent Risk Identification, Information Sharing, Interim Assessments, and Summarizing Lessons Learned.

The following section provides more information about each situation. For each, you will find examples of the agile products used and explanations from various offices on why they chose a particular type of agile product.

### PRIMARY SITUATIONS FOR AGILE PRODUCTS



URGENT RISK  
IDENTIFICATION



INFORMATION  
SHARING



INTERIM  
ASSESSMENT



SUMMARIZING  
LESSONS LEARNED







## A. URGENT RISK IDENTIFICATION

This is typically a descriptive product that outlines risk areas for agency consideration based on prior OIG work.

Examples of product formats include:

White Papers

Capstone Reports

Management Advisory Reports

Memorandums

To determine if an agile product identifying an urgent risk is right for your office, use the following examples as tools to inform your decision.

### Example A1

**WHO** Small Business Administration OIG

**WHAT** [\*Serious Concerns of Potential Fraud in the EIDL Program Pertaining to the Response to COVID-19\*](#)



*Strong indicators of widespread potential fraud and internal control deficiencies associated with SBA's Economic Injury Disaster Loan program required a flexible format to quickly communicate information to SBA OIG stakeholders. The Management Alert format allowed SBA OIG to first highlight suspicious activities and suspected fraud and then make immediate suggestions for improvement.*

### Example A2

**WHO** Department of Labor OIG

**WHAT** [\*The Pandemic Unemployment Assistance Program Needs Proactive Measures to Detect and Prevent Improper Payments and Fraud\*](#)



“The DOL OIG Alert Reports generally address a single time-sensitive issue with the agency, requesting the agency provide a response within one week. The DOL OIG issued this Alert Report to notify the department of an issue amidst an ongoing audit of the unemployment insurance program’s expansion under the CARES Act. They included the alert issue in the final audit report as well.

### Example A3

**WHO** Special Inspector General for the Troubled Assets Relief Program

**WHAT** [Letter to the Treasury Secretary Regarding Better Use of Funds](#)

“The need for immediate Treasury action prompted the Special IG’s letter to the Secretary. The Special IG wanted to bring to the Secretary’s attention that SIGTARP’s foreclosure prevention program held billions of dollars they could put to better use by repurposing the funds towards foreclosure prevention related to COVID-19.

### Example A4

**WHO** Department of Transportation OIG

**WHAT** [Key Potential Risk Areas for the Department of Transportation in Overseeing CARES Act Requirements](#)

“DOT OIG chose to release this as an official correspondence instead of a lengthy audit report format for two reasons: speed and quality. DOT OIG’s decision was driven by DOT’s need to quickly distribute \$36 billion in CARES Act funds and our desire to help identify oversight risks for those funds as soon as possible, all while following the full measure of our usual quality assurance process.





## B. INFORMATION SHARING

This is typically a descriptive product that provides a status or snapshot on agency or program activities or funding (e.g., allocation, use, etc.).

Examples of product formats include:

Status Reports

Flash Reports

Information Memorandums

To determine if an agile product to share information with agency management or other decision makers is right for your office, use the following examples as tools to inform your decision.

### Example B1

**WHO** Architect of the Capitol OIG

**WHAT** [Architect of the Capitol Status of CARES Act Funding](#)

“In response to rapidly changing resource requirements and the need for increased transparency in government budget functions, the AOC OIG chose the status report format to provide a readily accessible presentation of data that clearly outlines both the purpose and disbursement of allocated funds. Under the guidance of leadership, AOC OIG tailored the data for stakeholders who may use it to inform programmatic, operational, and legislative processes.

### Example B2

**WHO** Department of Justice OIG

**WHAT** [Status of CARES Act Funding as of June 12, 2020 \(Unaudited\)](#)



**Example B3****WHO** Department of the Interior OIG**WHAT** [The National Park Service's Coronavirus Response Operating Plans](#)

“The DOI OIG developed the “flash report” format to relay key information quickly and concisely. These reports are rapidly issued to decision makers, and the format—two columns, clearly structured, easy to read, with high-level overviews and data visualizations—provides actionable information quickly and concisely to support the oversight mission and promote accountability.

**Example B4****WHO** Small Business Administration OIG**WHAT** [Small Business Administration's Implementation of the Paycheck Protection Program Requirements](#)

“SBA OIG chose the Flash Report format because it needed to quickly provide information to three Senators, and this agile format was fast and flexible. The Flash Report allowed SBA OIG to summarize its ongoing oversight work and present a comparative analysis of key provisions of the CARES Act and SBA's rules, procedures, and public guidance for implementing the Paycheck Protection Program. SBA OIG highlighted gaps and suggested improvements to align Paycheck Protection Program requirements with the CARES Act.





## C. INTERIM ASSESSMENT

An interim assessment can also be used to share information more quickly with stakeholders during a broad scope review, a targeted assessment of a large program, or a series of reviews.

Examples of product formats include:

Management Alerts

Management Advisory Reports

Memorandums

Interim Reports

“To determine if an agile product providing an interim assessment is right for your office, use the following examples as tools to inform your decision.”

### Example C1

**WHO** Amtrak OIG

**WHAT** [Observations on Amtrak's Use of CARES Act Funds](#)

### Example C2

**WHO** Department of the Treasury OIG

**WHAT** [Interim Audit Update – Coronavirus Relief Fund Recipient Reporting](#)

“Treasury OIG identified a need to report an initial finding and recommendation prior to completion of all audit work, and therefore, selected the interim report format.”

### Example C3

**WHO** Department of Labor OIG

**WHAT** [COVID-19: MSHA Faces Multiple Challenges in Responding to the Pandemic](#)



“DOL OIG issued this limited scope audit report to provide the Mine Safety and Health Administration with useful and timely information about its initial response to the COVID-19 pandemic. DOL OIG conducts limited scope audits during the earliest stages of a new or revised program, funding, or expenditure to evaluate the adequacy of initial implementation.



## D. SUMMARIZING LESSONS LEARNED

This is typically a descriptive product that outlines lessons learned for agency consideration based on prior OIG work.

Examples of product formats include:

White Papers

Capstone Reports

Management Advisory Reports

Memorandums



To determine if an agile product summarizing lessons learned is right for your office, use the following examples as tools to inform your decision.



**Example D1****WHO** Small Business Administration OIG**WHAT** [Risk Awareness and Lessons Learned from Prior Audits of Entrepreneurial Development Programs](#)

“The white paper descriptive format allowed SBA OIG to quickly share details about its work on SBA’s entrepreneurial development programs. This agile format allowed SBA OIG to succinctly summarize previous findings, highlight relevant risk areas, and focus on key points to consider when administering COVID-19 funds.

**Example D2****WHO** Department of Labor OIG**WHAT** [CARES Act: Key Areas of Concern Regarding Implementation of Dislocated Worker Grant Provisions](#)

“DOL OIG issued this advisory report based on years of prior oversight work, reiterating issues raised applicable to the dislocated worker provisions included in the CARES Act. DOL OIG’s advisory reports do not include new work or new recommendations. They are generally issued at the start of a new or revised program, funding, or expenditure and serve as a notice of known key findings.

**Example D3****WHO** Department of Education OIG**WHAT** [Challenges for Consideration in Implementing and Overseeing the CARES Act](#)**Example D4****WHO** Department of Defense OIG**WHAT** [COVID-19 Expenditures – Lessons Learned Regarding Awareness of Potential Fraud, Waste, and Abuse Risk](#)

## Can Agile Products Include Recommendations?

An agile product can have a recommendation, but it is more likely that your product will include an informal recommendation, suggestion, key action, area of consideration, or nothing at all. For example, a product summarizing lessons learned may include considerations or advice based upon previous work completed by your office. In another example, a data brief with the intent of sharing information would likely not include a recommendation. However, it is at the discretion of each Inspector General to determine if a formal recommendation is needed.

## What Key Principles Should I Follow?

The following key principles apply to agile products issued quickly, performed in accordance with CIGIE's *Quality Standards for Federal Offices of Inspector General*. Please note these key principles do not apply to non-audit services your office agrees to perform for agency management.

## Quality Assurance Guidelines

Designed specifically for rapid delivery of information, agile products do not require the same level of quality assurance as an audit, inspection, or evaluation; however, the following key principles should be applied to agile products.



- ✓ **STAFF ASSIGNMENT** Employ staff who are competent and independent, and make sure enough staff are assigned according to the scope and timeframe of the product.
- ✓ **EVIDENCE REVIEW** Assess evidence for relevance, reliability, and sufficiency. Document the approach for collecting evidence according to the objective and nature of the project.
- ✓ **SUPERVISION** Ensure proper supervision of staff, especially for those teams with less experienced staff.





- ✓ **INDEX AND REFERENCING** Complete indexing and referencing, or other quality assurance review, for key facts and findings. Keep in mind that the Silver Book does not require that a product be indexed and referenced in its entirety, as with audits conducted under the Yellow Book. Indexing and referencing should also be completed as you go so you can release the product quickly.
- ✓ **LEGAL REVIEW** Conduct legal or other reviews at the discretion of your office based upon the content/objective of your agile product.

## Milestones and Timeframes for Completion

Milestones and timeframes for completion should be set based on the nature of the review and requirements of the requesting party (internal or external stakeholder). The following best practices, identified by various OIGs, should help keep your agile product moving quickly through the process.



- ✓ **INTERNAL BUY-IN** Ensure buy-in of rapid cycle by OIG senior leaders.
- ✓ **EFFICIENT ANALYSIS METHODS** Consider efficient timesaving data collection and analysis methods such as surveys and data-driven findings. (See [Appendix B: Review Techniques to Consider when Creating an Agile Product Related to the Pandemic Response](#) for more information on these analysis methods.)
- ✓ **CONCURRENT REVIEW** Expedite review by implementing a concurrent review with internal stakeholders (such as internal senior leaders, editors, visual communications specialists, etc.).

## Communication with Agency Management

Agile products using the Silver Book standards may be new to agency management. To ensure that all stakeholders understand the use of these standards, be sure to have open and ongoing communication with everyone involved, especially management. Various OIGs identified the following principles to follow when communicating with agency management about your agile product.





- ✓ **COMMUNICATE EARLY** As soon as you know about an agile product, make sure management knows why the product requires a short timeline and how they can support an expedited review. Explain how the process may differ from the usual processes, including the Silver Book standards used to validate the product.
- ✓ **COMMUNICATE REGULARLY** Ensure regular and open communication to maintain a positive rapport with the agency throughout the process. Meet with senior agency management on a regular basis to share information and discuss broader issues. Meetings help keep the work on track with the rigorous timeline.
- ✓ **AVOID SURPRISES** Share findings or observations, as appropriate, throughout the project to reduce surprises and conflicts during the reporting stage. When you share these findings, you should encourage agency management to start contemplating their

responses to help keep pace with the shorter timeframe. Ongoing communication is key to avoiding surprises or confusion, which in turn increases the likelihood of receiving an expedited response.

- ✓ **USE ENTRANCE AND EXIT CONFERENCES** Formal entrance and exit conferences can be used as a structured communication channel to inform agency management on latest the findings. Use these according to your office's preference.

### Product Distribution and Follow-up

How you classify your agile product, whether it is Sensitive But Unclassified or For Official Use Only, and how you distribute your agile product will be based on your office's preferences. If possible, we encourage you to post your agile products online in the interest of transparency and accountability. This will depend on the content of your agile product and your office's discretion.



- ✓ **MANAGEMENT RESPONSE** Send your agile product to agency management for review and response. Your office should determine whether to incorporate management's response into the report, and if so, whether it should be a summary or the full response. This will depend on the format and content of your agile product.
- ✓ **PRODUCT FOLLOW-UP** Identify, if applicable, the policies and procedures for following up on agile products. Since agile products will likely not include a formal recommendation, there may be some differences in follow-up procedures compared to non-agile products. Determine how your office plans to handle issuing, resolving, and following up on agile products and be sure agency management knows about and agrees with the plan.



## Appendix A: Objective and Approach



### Objective

This Agile Products Toolkit is designed to aid both federal Offices of Inspectors General (OIGs) as well as State and local agencies that provide oversight of Federal funds as they seek to conduct quick-response

reviews. These reviews relate not only to addressing the effects of the coronavirus disease 2019 (COVID-19) on federal operations (e.g., CARES Act expenditures, among others) but other emergent or ongoing challenges external to COVID-19 that require an expedited review (e.g., threats to health, safety, the environment, or to ensure effective stewardship in the expenditure of federal funds). This Toolkit is intended to provide a set of guidelines, best practices, and lessons learned, which we refer to as “key principles” to consider in conducting, completing, and expeditiously issuing reports or

other products. These products seek to provide the greatest benefit to senior agency management and Congressional stakeholders responsible for managing, overseeing, and ensuring effective stewardship of taxpayer funds. This Agile Products Toolkit does not create or mandate any new professional guidance, requirements, or standards. Oversight agencies remain responsible for adhering to applicable standards.

### Approach

To accomplish the above objective, the Audit Subcommittee under the PRAC established a working group comprised of representatives from five OIGs to identify the various types of agile products used across the community as well as best practices for developing and issuing such products. The working group solicited examples of product types and guidance from across CIGIE and conferred with the CIGIE Peer Review team to gather questions related



to policy. The working group researched the various types of products using information provided on the PRAC’s website, Oversight.gov, and individual OIG websites.

The best of existing guidance and products from across the CIGIE community has been distilled into this user-friendly, quick-reference guide for federal, state, and local agencies, to help provide oversight of federal funds through quality agile products.



## Appendix B: Review Techniques to Consider when Creating an Agile Product Related to the Pandemic Response

As part of the COVID-19 pandemic response, federal offices have operated in an increased telework environment and travel for on-site reviews has been limited. Within this operating model, your office will need to utilize new or additional techniques to obtain information it usually would through in-person interviews, physical observations, and controls testing.

This appendix discusses three review techniques to assist you in completing your agile product and may help identify additional types of reviews to consider for agile reporting. These review techniques include remote surveys, virtual “on-site” reviews, and increased data usage.

### Remote Surveys

Conducting a remote survey can help you collect information and data without having to travel. Design your remote survey in such a way that it encourages a high-response rate and rapid return. Review the list of recommendations below to help structure your survey accordingly.

- ✓ Acknowledge that the current operating environment is unusual and might make it more difficult to respond. Including this type of acknowledgement at the start of your survey helps build goodwill with the potential participants. It shows you know their time is valuable and you appreciate their efforts.
- ✓ Focus on questions that will help you complete your objectives. Make the distinction between what you need to know and what is good to know.



- ✓ Limit the number of questions asked. The more questions you ask, the longer it will take to complete the survey. Remember the people you are surveying may have limited time to respond.
- ✓ Keep it simple. Including questions that may be difficult to answer or require the participants to do a lot of work could decrease your response rate.
- ✓ Avoid using “agree or disagree” questions. These questions could influence the responses based upon the language used.
- ✓ To speed up your analysis of responses, use close-ended questions as much as possible. These include “yes” or “no” questions or questions that use a rating scale.
- ✓ Be careful not to ask double-barreled questions. These questions address more than one issue yet allow for only one response (Example: How satisfied are you with the response time and quality of service?)
- ✓ Ask someone to review your survey questions. Complete a pre-test of your survey questions by having volunteers complete the survey

to ensure the questions are easy to understand and answer. Adapt the survey based on the pre-test issues encountered or where questions were not clear.

- ✓ Consider including the survey questions and response summary in an appendix of your agile product.

### Examples of Survey-Driven Findings

(1) Department of Homeland Security OIG, *Early Experiences with COVID-19 at CBP Border Patrol Stations and OFO Ports of Entry*, [OIG-20-69](#), September 4, 2020

(2) Department of Justice OIG, *Remote Inspection of Federal Bureau of Prisons Contract Correctional Institution McRae, Operated by CoreCivic*, [20-098](#), August 31, 2020



## Virtual “On-site” Reviews

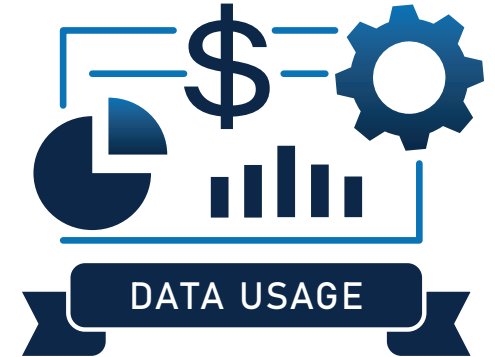
Offices of Inspectors General have increased their use of virtual collaboration platforms to conduct their work remotely and to create a virtual “on-site” environment. Consider the following virtual options and techniques to help you complete your work remotely:



- ✓ Virtual one-on-one video interviews with agency staff
- ✓ Virtual panels and group discussions using videoconferencing capabilities
- ✓ Video “walkthroughs” where agency staff use video capabilities to help a review team obtain physical evidence
- ✓ Photos with time and date stamps as physical evidence
- ✓ Screensharing to observe testing of various controls

## Increased Data Usage

Completing data-driven reviews can provide your office with insight into agency activities without completing on-site work. While the Silver Book standard does not require in-depth systems control testing, you can use some of those principles for assessing the appropriateness and sufficiency of the data. When collecting data to support your agile product, consider the following tips:



- ✓ Clearly identify the data source and how the selection was made for samples.
- ✓ Identify any limitations associated with the data and include a section to outline them for your readers.
- ✓ Attribute the information to the source, such as the Federal Procurement Data System or an internal agency data system.





- ✓ Obtain a data attestation statement from the agency/data system managers regarding the validity, the completeness, and any limitations of the data.
- ✓ Validate the data or information to the extent possible.

### Examples of Data-Driven Findings

- (1) Department of the Interior OIG, *August 2020: Where's the Money?* [2020-FIN-068](#), September 28, 2020
- (2) U.S. Department of Agriculture OIG, [USDA Coronavirus Disease Funding](#), September 30, 2020



### Data on Diversity, Equity, and Inclusion

Multiple studies and reports have looked at how the COVID-19 pandemic has affected racial and ethnic groups, both in terms of health and economics. One report focuses on the pandemic's effect on small businesses and the fact that Black, Latinx, and Asian businesses saw a greater percentage drop in ownership than white businesses. In addition, numerous reports from the Centers for Disease Control and Prevention document how long-standing systemic health and social inequities have increased the likelihood of adverse outcomes for many people from racial, ethnic, and socioeconomic minority groups, including dying from COVID-19. The Government Accountability Office released recommendations for the Centers



for Disease Control and Prevention to take additional measures to help ensure it maintains complete and consistent collection of demographic data in order to more clearly assess the impacts COVID-19 has on racial and ethnic minority groups. Similarly, the Small Business Administration's OIG issued a flash report revealing that SBA did not require demographic data collection related to the Paycheck Protection Program and, as such, would not be able to determine the loan amounts provided to prioritized underserved groups.

While not every agile product related to the pandemic response will assess the impacts on minority individuals or groups, we encourage OIGs to consider if any of their agile projects could address diversity, equity, and inclusion. Some areas to explore when planning agile projects are:

- ✓ Whether the agency collects relevant demographic data for its programs and operations.
- ✓ If the datapoints are collected, whether the information represents disproportionate impacts on protected classes of

individuals (for example, race, gender, age, ethnic origin, religion, sexual orientation, or disability).

- ✓ Whether the agency should collect additional demographic data to identify relevant issues.

### Examples of Reports with DE&I-Related Findings

(1) Federal Reserve Bank of New York, [\*Double Jeopardy: COVID-19's Concentrated Health and Wealth Effects in Black Communities\*](#), August 2020

(2) Special Inspector General for the Troubled Asset Relief Program, [\*Mismanagement of the Hardest Hit Fund in Georgia\*](#), [\*SIGTARP-18-001\*](#), October 13, 2017



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