



OFFICE OF THE INSPECTOR GENERAL

U.S. NUCLEAR REGULATORY COMMISSION
DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Audit of the NRC's Employee Reentry Plans

OIG-20-A-16

September 21, 2020



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

**OFFICE OF THE
INSPECTOR GENERAL**

September 21, 2020

MEMORANDUM TO: Margaret M. Doane
Executive Director for Operations

FROM: Dr. Brett M. Baker */RA/*
Assistant Inspector General for Audits

SUBJECT: AUDIT OF THE NRC'S EMPLOYEE REENTRY PLANS
(OIG-20-A-16)

Attached is the Office of the Inspector General's (OIG) audit report titled *Audit of the NRC's Employee Reentry Plans*.

The report presents the results of the subject audit. Following the September 15, 2020, exit conference, agency staff indicated that they had no formal comments for inclusion in this report.

Please provide information on actions taken or planned on the recommendation within 30 days of the date of this memorandum. Actions taken or planned are subject to OIG followup as stated in Management Directive 6.1.

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at (301) 415-5915 or Paul Rades, Team Leader, at (301) 415-6228.

Attachment: As stated



Office of the Inspector General

U.S. Nuclear Regulatory Commission
Defense Nuclear Facilities Safety Board

OIG-20-A-16

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Results in Brief

Why We Did This Review

The federal government took steps to contain the spread of Coronavirus Disease-2019 (COVID-19) among its workforce. The Nuclear Regulatory Commission (NRC) made telework mandatory for all but a few employees effective March 19, 2020.

The NRC published its agencywide employee reentry plan on April 23, 2020. The NRC plan is a living document that is updated according to changing conditions and guidance.

The NRC Inspector General received a letter from the Chairman of the Subcommittee on Government Operations, House Government Oversight and Reform Committee, on June 15, 2020. The letter requested a review of the NRC's plans and procedures for returning employees to federal offices.

The audit objective was to determine if NRC plans for returning employees to government facilities were prepared in accordance with governmentwide guidance and agreed-upon best practices for safe, healthy, and effective office re-openings.

Audit of the NRC's Employee Reentry Plans

What We Found

The OIG found that the NRC developed employee reentry plans in accordance with governmentwide guidance and agreed-upon best practices to promote the health and safety of employees and their communities by considering local conditions, human capital flexibilities, and work restructuring to ensure worker safety. In addition, NRC program offices and regional offices managing the agency's inspection programs have developed processes to address the specific conditions facing NRC resident inspectors and team inspectors based in the regions.

The agency's response to pandemic challenges informed the planning process. In particular, communications and decisions taken gave management a good understanding of staff needs and operational risks in reentry planning. Reentry planning was needed because levels of absenteeism did not trigger the agency Continuity of Operations or Pandemic plans. NRC reentry planning benefitted from agile decisionmaking and rethinking work processes to perform mission activities while using telework to protect the health and safety of the workforce. Documenting lessons learned from this experience could provide valuable insight into future NRC planning for pandemics or other contingencies.

What We Recommend

This report makes a recommendation to capture and document lessons learned for future use during public health emergencies or other events that could cause prolonged disruption of agency operations. Agency management stated their general agreement with the findings and recommendations in this report.

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ABBREVIATIONS AND ACRONYMS

CDC	Centers for Disease Control and Prevention
COOP	Continuity of Operations
COVID-19	Coronavirus Disease-2019
NRC	Nuclear Regulatory Commission
OIG	Office of the Inspector General
OMB	Office of Management and Budget
OPM	Office of Personnel Management
OSHA	Occupational Safety and Health Administration
PPE	Personal protective equipment

I. BACKGROUND

The U.S. Department of Health and Human Services declared a Public Health Emergency on January 31, 2020 in response to the Coronavirus Disease-2019 (COVID-19) outbreak. The federal government subsequently took steps to contain the spread of COVID-19 among its workforce, such as extending maximum telework and work schedule flexibilities for federal agencies. On March 17, 2020, the Office of Management and Budget (OMB) further expanded use of telework and gave agencies 2 days to take decisive action. The Nuclear Regulatory Commission (NRC) made telework mandatory for all but a few employees effective March 19, 2020.

Following the shift to mandatory telework, the immediate focus of NRC management and staff was completing its mission with a remote workforce, overseeing licensees who were also impacted by the pandemic. A COVID-19 Task Force addressed internal response operations for the pandemic, with support from subject matter experts in a COVID-19 Working Group. The NRC published its agencywide reentry plan, called the "NRC COVID-19 Re-Occupancy Plan," on April 23, 2020. The NRC plan is a living document that is updated according to changing conditions and guidance. According to the decision bases in the plan, the NRC transitioned to Phase 1 of the plan for all office facilities beginning June 15, 2020, moving from mandatory telework to maximum telework on June 21, 2020. On July 12, 2020, the agency transitioned to Phase 2 for three facilities, while the others remain in Phase 1.¹ In Phase 2 of the plan, NRC facilities shift to expanded telework with maximum flexibilities for employees.

The NRC Inspector General received a letter from the Chairman of the Subcommittee on Government Operations, House Government Oversight and Reform Committee, on June 15, 2020. The letter requested that the Office of the Inspector General (OIG) examine the NRC's plans and

¹ NRC Headquarters in Rockville, MD, Region I in King of Prussia, PA, and Region III in Lisle, IL, moved to Phase 2. Region II in Atlanta, GA, Region IV, in Arlington, TX, and the Technical Training Center in Chattanooga, TN, remained in Phase 1. Resident inspectors' site coverage is calibrated to site-specific conditions.

procedures for returning employees to federal offices in the wake of the coronavirus pandemic.

II. OBJECTIVE

The audit objective was to determine if NRC plans for returning employees to government facilities were prepared in accordance with governmentwide guidance and agreed-upon best practices for safe, healthy, and effective office re-openings. Appendix A of this report contains information on the audit scope and methodology.

III. FINDING

The OIG found that the NRC developed employee reentry plans in accordance with governmentwide guidance and agreed-upon best practices to promote the health and safety of employees and their communities. More can be done to capture the results of the agency's planning and response to the pandemic to prepare for future events.

NRC Employee Reentry Plans Comply with Federal Guidance and Agreed-Upon Best Practices

Federal guidance for employee reentry directs agencies to consider local conditions, human capital flexibilities, and work restructuring to ensure worker safety. NRC reentry planning met those federal criteria and included best practices, while the agency's response to pandemic challenges informed the planning process. Reentry planning was needed because agency Continuity of Operations and Pandemic plans did not anticipate the current situation. NRC reentry planning benefitted from agile decisionmaking and rethinking work processes, which can be captured for future events.

What Is Required

Federal Guidance Requirements

Federal guidance requires agencies to develop plans to protect the health and safety of employees and support a phased return to normal work operations.

National Guidelines for Opening Up America Again

The White House issued the *National Guidelines for Opening Up America Again*² (National Guidelines) in partnership with the Centers for Disease Control and Prevention (CDC) to describe data-driven gating criteria that should be met before a region or state proceeds to a three-phase approach for gradually resuming operations.

The phases protect vulnerable individuals,³ mitigate risks of resurgence, are based on data, and can be implemented statewide or county-by-county. In addition, the phases offer guidance for employers supporting the need for individuals to maintain social distancing.

OMB/OPM Memorandum M-20-23

OMB/Office of Personnel Management (OPM) Memorandum M-20-23,⁴ "Aligning Federal Agency Operations with the *National Guidelines for Opening Up America Again*" parallels the National Guidelines and calibrates a return to normal operations to the phase of the state, county, region, or metropolitan area.

The memorandum instructs federal agencies to establish processes that

- Consider State and regional assessments and issues such as school and daycare closures, mass transit availability, parking availability,

² The White House [National Guidelines for Opening Up American Again](#), were issued April 16, 2020.

³ The National Guidelines define vulnerable individuals as the elderly and those with serious underlying health conditions.

⁴ [M-20-23](#) "Aligning Federal Agency Operations with the *National Guidelines for Opening Up America Again*," was issued April 20, 2020.

facility requirements, and missions.

- Tailor mitigation measures to the specific type of workplace and occupation.
- Develop and continue to use appropriate telework protocols for their operations.
- Accept self-identification by employees that they are in a population that the CDC has identified as being at higher risk for serious complications from COVID-19, or in a CDC-identified special population.
- Assess employees' needs.
- Implement optimized operations and new work arrangements.
- Apply policies and directives to individuals and work units within diverse operational environments and locations.
- Restrict infected individuals from entering facilities through screening.
- Provide adequate hygiene supplies and appropriate personal protective equipment (PPE).
- Follow CDC guidelines for routine and deep cleaning.
- Implement social distancing procedures, including controls in open space environments and closing of common areas.

When developing new policies and processes, agencies should review CDC and Department of Labor guidance and other appropriate resources.

OSHA Guidance on Returning to Work

Occupational Safety and Health Administration (OSHA) 4045-06 2020 *Guidance on Returning to Work*⁵ provides additional focus on the need for employers to develop and implement strategies for basic hygiene (e.g.,

⁵ OSHA [Guidance on Returning to Work](#) was published in June 2020.

hand hygiene, or cleaning and disinfection), social distancing, and identification and isolation of sick employees. OSHA guidance also discusses engineering and administrative controls and work process flexibilities, assessment of occupational job hazards, and employee training.

What We Found

NRC Plans Meet Federal Requirements

The NRC agencywide plan and supplemental regional facility plans meet the requirements of the federal guidance. Appendix B contains a crosswalk of requirements in the guidance with features of the NRC agencywide and supplemental regional plans.

Inspectors in the Field

In addition, the NRC program offices and regional offices managing the agency's inspection programs have developed processes to address the specific conditions facing NRC employees working in the field, resident inspectors and team inspectors based in the regions. The processes are founded on the same criteria as the agencywide plan. The regions have developed decisionmaking protocols for consistent consideration of critical factors, with the objective of balancing mission goals with the safety of NRC employees and licensee employees.

Best Practices

The NRC has implemented best practices in developing plans and preparing facilities for employee reentry. The agency has gathered and continues to monitor data for decisionmaking from widely accepted public epidemiological reporting sites, such as Johns Hopkins University and State and county dashboards. The NRC also receives reports of conditions from licensees on pandemic impacts at their facilities. The NRC has engaged in benchmarking with other federal agencies to identify good practices and determine consistent approaches to local conditions in the areas around NRC facilities. Private sector standards for building systems are among technical best practices followed. Further, the NRC

has developed required training for staff in the policies and procedures intended to mitigate risks of facility reentry.

Two-Way Communications

The NRC has engaged in extensive multi-channel communications efforts in implementing its pandemic policies and procedures. With transparency as a priority, the Task Force has communicated frequently with staff through announcements, internal website information hubs, and participation in staff meetings. Other strategies for engaging with staff include polling and a resource mailbox to receive questions, ideas, and comments. During the early stages of the emergency, frequent status meetings among agency units at different management levels coordinated problem-solving and policy implementation and reinforced direct communications with staff about policies and procedures. Externally, the NRC has maintained a public website resource related to the agency's COVID-19 status and initiatives. The agency has reached out to other federal agencies, through activities such as Federal Executive Forum meetings and communications and status reporting to the OMB.

An example of the way NRC communications supported the implementation of the reentry plan was the decision to suspend temperature screening for facilities moving to Phase 2. Staff polling indicated few additional staff would return to offices in Phase 2. The agency also benchmarked against other federal agencies. When these inputs combined with increasing awareness that asymptomatic individuals cannot be identified through temperature screening, the agency determined to conserve screening resources for a potential future return to Phase 1 that could be prompted by a resurgence of cases.

Response Informed Reentry Planning

NRC efforts to respond to the challenges presented by COVID-19 informed the reentry planning process.

- Through the Task Force, agency management spent weeks in response mode, fielding and responding to questions from staff, and developing alternative work processes to perform mission work. The communications and decisions taken gave management a good

understanding of staff needs and operational risks in reentry planning.

- Solving the problem of procuring and sharing hygiene supplies, such as hand sanitizer, and appropriate PPE to protect inspectors and later to be available in office facilities reinforced communications and cooperation among agency units.
- In planning, the regional offices moved ahead before the agencywide plan and policies were finalized because of the need to make timely decisions to support inspections. Although they used the same federal guidance, the regions had to ensure alignment through communications with the Task Force and Working Group. Regional sharing of plans fostered communications and consensus, even as each facility faced different conditions.
- The White House guidance provided flexibility to the agency to plan according to conditions and its mission. This was necessary but also required the agency to work without pre-existing plans or models. Consensus decisionmaking within the Task Force enabled the agency to move quickly to make appropriate decisions for its workforce as it focused on COVID-19 response.

Why This Occurred

COOP and Pandemic Plans Not Activated

Reentry planning was needed because the NRC Continuity of Operations (COOP) and Pandemic plans did not anticipate the current situation. Both plans prepare for disruption of operations with structured approaches to continuing critical work, sharing resources, and returning to normal conditions. Specific levels of absenteeism from pandemic disease trigger the Pandemic plan processes. The NRC never reached those levels of absenteeism among staff. NRC managers drew on the reconstitution sections from the agency's COOP and Pandemic plans to support reentry planning but did not activate these plans.

Why This Is Important

Lessons Learned Could Provide Insight

The NRC demonstrated agile decisionmaking in rethinking work processes to perform mission activities while using telework to protect the health and safety of the workforce. The planning process considered many areas of agency operations, drawing on the agency's response experience. However, pandemic uncertainties may keep the agency in its current status for a longer term than previously envisioned. The NRC has begun a lessons-learned process by soliciting staff input for evaluation of pandemic-related policies and procedures. Documenting lessons learned from this experience could provide NRC staff valuable insight into future planning for pandemics, natural disasters, or other contingencies.

Recommendation

The OIG recommends that the Executive Director for Operations

1. Capture and document lessons learned for future use during public health emergencies or other events that could cause prolonged disruption of agency operations.

IV. AGENCY COMMENTS

The OIG held an exit conference with the agency on September 15, 2020. Prior to this meeting, agency management reviewed a discussion draft and provided comments that have been incorporated into this report, as appropriate. At the meeting, agency management stated their general agreement with the findings and recommendation in this report and opted not to provide formal comments for inclusion in this report.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

To determine if NRC plans for returning employees to government facilities were prepared in accordance with government-wide guidance and agreed-upon best practices for safe, healthy, and effective office re-openings.

Scope

The audit focused on the NRC's inputs to decisionmaking processes regarding employee work and reentry plans during the COVID-19 pandemic. The OIG conducted this performance audit from July 2020 through August 2020, at NRC headquarters in Rockville, MD. The audit team reviewed and analyzed internal controls related to the audit objective.

Methodology

The OIG reviewed relevant federal criteria and guidance documents for this audit including:

- White House *National Guidelines for Opening Up America Again*, April 16, 2020.
- Office of Management and Budget and Office of Personnel Management M-20-23, *Aligning Federal Agency Operations with the National Guidelines for Opening Up America Again*, April 20, 2020.
- Occupational Safety and Health Administration OSHA 4045-06 2020, *OSHA Guidance on Returning to Work*, June 2020.
- Centers for Disease Control and Prevention, *Interim Guidance for Businesses and Employers*, May 2020.

- Office of Personnel Management, *Questions and Answers on Human Resources Flexibilities and Authorities for Coronavirus Disease 2019 (COVID-19)*, March 7, 2020.
- Office of Management and Budget Memorandum M-20-16, *Federal Agency Operational Alignment to Slow the Spread of Coronavirus COVID-19*, March 17, 2020.
- Government Accountability Office GAO-14-704G, *Standards for Internal Control in the Federal Government*, September 2014.

The OIG analyzed relevant NRC planning documents for consistency with federal reentry guidance, including:

- NRC *Continuity of Operations Plan*, May 2017, and *Pandemic Plan*, March 2020.
- NRC Re-Occupancy Plan, April 23, 2020.

In addition, the OIG analyzed the supplemental reentry plans of NRC regional offices, NRC guidance for conducting inspections during the pandemic, NRC guidance and training for staff reentry procedures, and Frequently Asked Questions published for employees.

The audit team conducted interviews with managers and staff at headquarters and the regional offices to gain an understanding of the process of and decisionmaking inputs to development of the NRC COVID-19 employee reentry plans. The OIG interviewed a representative of the agency chapter of the National Treasury Employees Union to understand how the union participated in planning decisions. Further, the OIG observed the NRC building entry screening process, reviewed building occupancy data, and evaluated results of staff polls.

We conducted this performance audit 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.

Throughout the audit, auditors considered the possibility of fraud, waste, and abuse in the program.

The audit was conducted by Paul Rades, Team Leader; Amy Hardin, Audit Manager; and Justyn Alexander, Student Intern.

Crosswalk of Federal Requirements and NRC Reentry Plans⁶

Criteria Document	Guidance/ Best Practices	NRC Agencywide Plan	Region I	Region II	Region III	Region IV	Met?
National Guidelines for Opening Up America Again	Develop and implement appropriate policies.	Comprehensive agencywide plan that incorporates federal guidance. Phases mirror National Guidelines, added Phase 0 to represent mandatory telework.	Refers to agencywide plan, federal guidance and regional specifics. Phase change decision made by agency senior leadership consistent with State/local guidelines.	Refers to agencywide plan, federal guidance and regional specifics.	Refers to agencywide plan, federal guidance and regional specifics. Phase change decision made by agency senior leadership with regional input.	Refers to agencywide plan, federal guidance and regional specifics. Phase change decision made by agency senior leadership with regional input.	Yes
National Guidelines for Opening Up America Again	Monitor workforce for indicative symptoms.	Phase 1: Screening. Phase 2: Staff self-assessment of symptoms.	Same.	Same.	Same.	Same.	Yes
National Guidelines for Opening Up America Again	Develop and implement policies and procedures for workforce contact tracing.	Contact tracking – monitoring locations in building to support additional cleaning and agency announcement.	Same.	Silent; agencywide guidance in training module.	Silent; agencywide guidance in training module.	Same.	Yes
OMB/OPM M-20-23, Aligning Federal Agency Operations with the National Guidelines for Opening Up America Again	Establish gating criteria for phases for re-entry.	Gating criteria cited, plan reflects headquarters jurisdictions in MD, DC, VA.	Same, information for Philadelphia and Montgomery County, PA.	Same, information for Atlanta area.	Same, status for State of Illinois.	Same, information for Tarrant County, TX.	Yes

Source: OIG generated.

⁶ The sixth NRC facility, the Technical Training Center, was not reviewed separately. It is covered by the agencywide re-occupancy plan.

Criteria Document	Guidance/ Best Practices	NRC Agencywide Plan	Region I	Region II	Region III	Region IV	Met?
OMB/OPM M-20-23	Effective communication to all stakeholders.	Two-way includes: staff polls; internal/external websites/resources; all-hands meetings; notices/updates; resource mailbox; social media posts; internal blog.	Same agencywide; Regional all-hands meetings; calls with headquarters and other regions.	Same agencywide; Regional all-hands meetings; calls with headquarters and other regions.	Same agencywide; Regional all-hands meetings; calls with headquarters and other regions.	Same agencywide; Regional all-hands meetings; calls with headquarters and other regions.	Yes
OMB/OPM M-20-23	Maximum telework, schedule, and workplace flexibilities.	Phase 0: Mandatory telework per OMB 3/17/2020 Phase 1-2: Maximum telework/work schedule flexibilities per OMB 3/15/2020. Telework policy updated as of June 30, 2020.	Same/follows agency plan and federal guidance.	Same/follows agency plan and federal guidance.	Same/follows agency plan and federal guidance.	Same/follows agency plan and federal guidance.	Yes
OMB/OPM M-20-23	Entry screening policies and procedures.	Phase 1: Screening. Phase 2: Staff self-assessment of symptoms.	Same/follows agency plan.	Same/follows agency plan.	Same/follows agency plan.	Same/follows agency plan.	Yes
OMB/OPM M-20-23	Implement social distancing procedures.	Social distancing: floor markings, restrictions on common areas, limit elevator occupants.	Same/follows agency plan. Residents rotate in office.	Same/follows agency plan. Residents rotate in office.	Same/follows agency plan. Residents rotate in office.	Same/follows agency plan. Residents rotate in office.	Yes
OMB/OPM M-20-23	Adhere to CDC guidelines for cleaning protocols.	Modified cleaning contract for high-touch areas and deep cleaning when needed.	Work through General Services Administration for landlord to provide enhanced/deep cleaning.	Work through General Services Administration for landlord to provide enhanced/deep cleaning.	Work through General Services Administration for landlord to provide enhanced/deep cleaning.	Work through General Services Administration for landlord to provide enhanced/deep cleaning.	Yes

Criteria Document	Guidance/ Best Practices	NRC Agencywide Plan	Region I	Region II	Region III	Region IV	Met?
OSHA 4045-06 2020	Controls – engineering, administrative, PPE.	Social distancing actions. Maximize telework to minimize building occupancy. Mask required outside of individual workspace.	Same. PPE provided to residents and inspectors.	Same. Monitor building occupancy; rotating schedule. PPE provided to residents and inspectors.	Same. Monitor building occupancy. PPE provided to residents and inspectors.	Same. Monitor building occupancy; rotating schedule. PPE provided to residents and inspectors.	Yes
OSHA 4045-06 2020	Hazard assessment.	Program office guidance to regions for resident inspectors and regional inspectors.	Protocols for resident and regional inspection decisions.	Protocols for resident and regional inspection decisions.	Protocols for resident and regional inspection decisions.	Protocols for resident and regional inspection decisions.	Yes
OSHA 4045-06 2020	Basic and industrial hygiene.	Basic hygiene: Soap, water and paper towels readily available. Sanitizer, wipes distributed to staff in March.	Basic hygiene supplies provided to inspectors and available to staff.	CDC guidance for basic hygiene. Basic hygiene supplies provided to residents.	CDC guidance for basic hygiene; each employee given a kit with reusable mask, other supplies. Basic hygiene supplies provided to residents.	CDC guidance for basic hygiene; each employee given a kit with reusable mask, other supplies. Basic hygiene supplies provided to residents.	Yes
OSHA 4045-06 2020	Identification and isolation.	Procedures and designated space for employees who become ill onsite.	Same.	Silent; mitigation if someone gets sick; agencywide plan/training prevail.	Same.	Same.	Yes
OSHA 4045-06 2020	Return to work after illness/exposure.	Self-quarantine period.	Same.	Silent; agencywide plan and training prevail.	Same.	Same.	Yes
OSHA 4045-06 2020	Training.	Agencywide training and acknowledgement required prior to facility reentry.	Silent; agencywide requirement.	States agencywide requirement.	States agencywide requirement.	States agencywide requirement.	Yes

Criteria Document	Guidance/ Best Practices	NRC Agencywide Plan	Region I	Region II	Region III	Region IV	Met?
OSHA 4045-06 2020	Anti-retaliation.	"No questions asked" policy for concerns about return to workplace. Dept of Labor Employee rights posted on COVID-19 resource page. NTEU in discussions; works with Labor Relations on individual cases.	Same.	Same.	Same.	Same.	Yes

TO REPORT FRAUD, WASTE, OR ABUSE

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COMMENTS AND SUGGESTIONS

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