



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

INSUFFICIENT DOCUMENTATION OF USE OF EXTENDED ADMINISTRATIVE LEAVE AT THE U.S. DEPARTMENT OF THE INTERIOR




**OFFICE OF
INSPECTOR GENERAL**
U.S. DEPARTMENT OF THE INTERIOR

MAR 30 2017

Memorandum

To: Amy Holley
Acting Assistant Secretary for Policy, Management and Budget

From: Mary L. Kendall 
Deputy Inspector General

Subject: Final Evaluation Report – Insufficient Documentation of Use of Extended
Administrative Leave at the U.S. Department of the Interior
Report No. 2016-ER-070

This report presents the results of our evaluation of the use of extended administrative leave at the U.S. Department of the Interior (DOI). We make four recommendations to help DOI and its bureaus more effectively manage and oversee the use of extended administrative leave. DOI concurred with all of our recommendations in its March 23, 2017 response to our draft report (see Appendix 2 of this report). Based on the response, we consider recommendations 1, 2, and 4 to be resolved but not implemented, and recommendation 3 to be resolved and implemented. We will refer the three recommendations not yet implemented to the Office of Policy, Management and Budget to track their implementation.

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, evaluation, and inspection reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

If you have any questions regarding this report, please call me at 202-208-5745.

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Results in Brief

Between January 2013 and July 2016, the U.S. Department of the Interior (DOI) and its bureaus placed 242 employees on extended administrative leave—45 calendar days or more—at a cost of more than \$6 million in salaries. DOI did not sufficiently document decisions made regarding the use of extended administrative leave, resulting in inefficient management and oversight. More specifically, DOI did not document—

- approvals to use extended administrative leave;
- consideration of alternatives to using administrative leave; and
- notifications to the employee that he or she was being placed on administrative leave.

In June 2016,¹ DOI issued a new administrative leave policy, which reduced the number of days that a bureau could place an employee on extended administrative leave without senior management approval from 45 calendar days to 14 calendar days and initiated requirements for requests over 14 days, including—

- required approval at the departmental level;
- required consideration of alternatives to administrative leave to be documented;
- required consultation with the Office of the Solicitor to be documented; and
- required quarterly monitoring of all employees on administrative leave.

In addition to DOI's policy changes, on December 23, 2016, the Administrative Leave Act² was signed into law, which places a number of restrictions on the use of administrative leave throughout the Federal Government. The U.S. Office of Personnel Management (OPM) has 270 days from the enactment of the law to issue regulations and guidance on the Act, and Federal agencies have 270 days after OPM issues its guidance to implement policies.

We believe that the recent DOI policy change will address some, but not all, of the administrative leave issues we identified. Without appropriate documentation, DOI cannot demonstrate that it is appropriately managing the use of extended administrative leave. In addition, DOI will need to begin planning how it will meet the requirements of the Act.

We made four recommendations to help DOI more effectively manage and oversee the use of extended administrative leave and begin preparing for the requirements of the Act. DOI has concurred with all of our recommendations.

¹Our sample did not include employees first placed on administrative leave after the new policy went into effect.

² Administrative Leave Act of 2016, Pub. L. No. 114-328, § 1138, 130 Stat. 2000.

Introduction

Objective

We evaluated the U.S. Department of the Interior's (DOI) management of extended administrative leave to identify—

1. how many DOI employees were on extended administrative leave and the factors that contributed to the length of time employees were on extended administrative leave; and
2. whether DOI policies provided enough guidance for DOI and its bureaus to properly manage extended administrative leave.

Appendix 1 includes the details of our scope and methodology.

Background

Administrative leave is an excused absence for an employee without losing pay or leave to which the employee is entitled. Prior to the enactment of the Administrative Leave Act of 2016 in December 2016, there was no specific statutory authority for using administrative leave, but the U.S. Office of Personnel Management (OPM) provides direction on permissible use for the Federal Government. According to OPM, administrative leave should not be used for an extended or indefinite period of time or on a recurring basis. Appropriate uses include blood donations and closures due to severe weather or other emergencies. Administrative leave may also be used in conjunction with employee performance or misconduct. OPM, however, emphasizes that, in these cases, agencies should only use administrative leave for brief absences and only when no reasonable alternative exists.

In response to Congress' concerns about use of extended administrative leave, the U.S. Government Accountability Office (GAO) audited Governmentwide use of administrative leave.³ GAO identified personnel matters, such as investigations into alleged misconduct, as the most common reason for using extended administrative leave. GAO also evaluated administrative leave policies at the U.S. Department of Homeland Security, which noted similar findings.⁴

As a result of Congress' concerns and GAO's reports, in June 2016, DOI issued Personnel Bulletin 16-01, "Modification to Administrative Leave Procedural Guidelines," which modified existing administrative leave policy found in the Departmental Manual (370 DM 752, "Discipline and Adverse Actions," and the "Absence and Leave Handbook"). Both versions of the policy focused on

³ GAO-15-79, "Federal Paid Administrative Leave: Additional Guidance Needed to Improve OPM Data," October 2014.

⁴ GAO-16-342, "Administrative Leave: Evaluation of DHS's New Policy Can Help Identify Progress towards Reducing Leave Use," March 2016.

administrative leave related to employee misconduct or unacceptable performance and emphasized that administrative leave should only be considered in rare circumstances when the employee's continued presence may be injurious to the employee or others, may result in loss or damage to Government property, or may jeopardize Government interests. Even in these circumstances, both policies stated that alternatives to administrative leave, such as reassigning the employee or requiring the employee to telework, should be considered.

DOI's June 2016 policy reduced the number of days an employee could be on extended administrative leave without approval from senior management from 45 calendar days to 14 calendar days. The new policy also requires the bureau director to sign and submit a memorandum requesting extended administrative leave to DOI's Office of Human Resources (OS/OHR) and to consult with the Office of the Solicitor's Employment and Labor Law Unit (ELLU). The memorandum must specifically include why the employee's continued presence in the workplace would be harmful to the employee or others and why no alternatives were appropriate. While the previous policy required consultation with OS/OHR and the Office of the Solicitor as appropriate, it did not offer specific guidance about how to coordinate with these offices. In addition, the new policy also requires the Deputy Assistant Secretary for Human Capital and Diversity to approve all administrative leave requests that will extend beyond 14 calendar days. The new policy also requires OS/OHR to conduct quarterly reviews of all employees on extended administrative leave.

The Administrative Leave Act of 2016⁵ was signed into law on December 23, 2016, to govern the use of administrative leave. The Act amends current Federal law regarding paid leave by adding administrative leave, investigative and notice leave, and weather and safety leave. The Act restricts administrative leave use to 10 work days per calendar year, and offers provisions for investigative and notice leave. Investigative leave may not exceed 120 work days without congressional notification, and notice leave is limited to the length of the notice period. OPM has 270 days from the Act becoming law to issue regulations and guidance, and Federal agencies have 270 days after OPM issues its guidance to implement policies that meet the requirements of the Act.

⁵ Included as Sec. 1138 of the National Defense Authorization Act of 2017.

Findings

Between January 2013 and July 2016, DOI and its bureaus placed 242 employees on extended administrative leave (45 calendar days or more), costing DOI more than \$6 million in salaries. Many factors, including legal procedural steps to be completed before taking adverse action or time for completing investigations, contributed to the length of time an employee was on administrative leave. DOI, however, did not sufficiently document decisions related to using extended administrative leave, and as a result paid those salaries without sufficient evidence that the leave was appropriate. DOI now has an opportunity to improve how it monitors and documents administrative leave.

We also identified impediments DOI may face as it begins preparing for the requirements of the Administrative Leave Act of 2016.

DOI Placed 242 Employees on Extended Administrative Leave Due to Various Factors

According to OPM, inherent authority allows Federal agencies to place employees on administrative leave under appropriate circumstances and for an appropriate length of time. OPM guidance indicates that agencies should not use administrative leave for extended absences. We reviewed time and attendance records for DOI personnel between January 2013 and July 2016 and found that DOI placed 242 employees on administrative leave for 45 days or more, resulting in DOI paying more than \$6 million to employees on extended administrative leave (see Figure 1).

Bureau	Employees	Administrative Leave Hours	Salary Cost*
National Park Service	69	61,977	\$2,059,968
Indian Affairs [†]	83	54,813	1,821,214
Bureau of Land Management	27	19,837	700,815
U.S. Fish and Wildlife Service	21	14,532	504,127
U.S. Geological Survey	17	10,861	406,096
Office of the Secretary	8	5,083	229,479
Bureau of Reclamation	12	5,040	174,861
Bureau of Safety and Environmental Enforcement	4	4,678	182,121
Bureau of Ocean Energy Management	1	809	37,503
Total	242	177,630	\$6,116,184

* We calculated the salary cost based on the average salary cost of all employees on extended administrative leave during our period of review. This amount does not include the cost of benefits.

† Indian Affairs includes the Bureau of Indian Affairs and the Bureau of Indian Education.

Figure 1. DOI employees on extended administrative leave from January 1, 2013, to July 23, 2016.

Of the 242 employees on extended administrative leave during our review period, we selected a sample of 30 employees, which included the 15 longest cases of administrative leave use, and a random selection of 15 additional cases. Our sample included employees from seven bureaus. Overall, we found that the majority of these employees—22 employees or 73 percent—were put on administrative leave for matters related to misconduct allegations (see Figure 2). While a significant majority of our sample came from only a few bureaus, without effective monitoring and documentation, all DOI bureaus are at risk for excessive use of administrative leave.

Bureau	Conduct	Security Clearance	Medical	Employee Safety	EEOC	Total
National Park Service	13	2	0	1	1	17
Indian Affairs	4	0	0	0	1	5
Bureau of Land Management	1	0	2	0	0	3
U.S. Geological Survey	2	0	0	0	0	2
U.S. Fish and Wildlife Service	0	0	1	0	0	1
Bureau of Reclamation	1	0	0	0	0	1
Bureau of Safety and Environmental Enforcement	1	0	0	0	0	1
Total	22	2	3	1	2	30

Figure 2. Our sample of DOI employees on extended administrative leave from January 1, 2013, to July 23, 2016, broken down by bureau and reason placed on administrative leave.

We identified several factors, similar to those outlined by GAO, that contribute to the amount of time an employee remains on administrative leave, including investigative actions, legal requirements, inefficient agency procedures, and settlement agreements. These factors are not mutually exclusive, and often combine to contribute to extended periods of administrative leave use.

Investigative Actions

Employees under investigation for allegations of misconduct are often placed on administrative leave until the investigation is completed. The amount of time spent on administrative leave could be extensive, potentially involving multiple interviews or requiring investigations by third parties. We have highlighted several examples from our sample where time for investigative actions contributed substantially to the amount of time on extended administrative leave. Other factors, such as legal requirements or agency inefficiencies, may have also contributed to the time on administrative leave.

- Indian Affairs placed a school employee on administrative leave for 183 days while the local prosecutor investigated the employee for suspected child abuse. The charges were unsubstantiated. The total salary cost was more than \$10,000.
- Indian Affairs placed another employee on administrative leave while the employee was a subject in a DOI Office of Inspector General investigation that lasted more than 1 year. The employee was on administrative leave for 448 calendar days and paid a salary of more than \$94,000. The employee resigned before any adverse action was proposed and was never prosecuted.
- The Bureau of Safety and Environment Enforcement (BSEE) placed an employee on administrative leave in October 2013 while BSEE investigated the alleged misconduct. As a result of the investigation, BSEE proposed to remove the employee in July 2014. The employee was removed in November 2014 after accruing 388 days of administrative leave at a salary cost of more than \$56,000. This removal was subsequently changed to a resignation as part of a settlement agreement.

Legal Requirements

DOI policy (370 DM 752) and Federal statutes and regulations (5 U.S.C. ch. 75 and 5 C.F.R. pt. 752) require certain procedural steps before taking adverse action against an employee. For serious adverse actions, such as a removal, suspension of greater than 14 days, or reduction in grade or pay, Federal agencies must provide at least 30 days' advance written notice of proposed adverse action against an employee.⁶ The employee is then entitled to a minimum of 14 days by DOI policy to respond to the notice and to provide any documentation.

In addition, Federal law (5 C.F.R. § 752.404(c)(3)) states that an employee who requests that an agency consider any medical condition that could contribute to conduct or performance issues must be given a reasonable time to furnish medical documentation. Additional time may also be required if the agency and the employee negotiate a settlement agreement. We have highlighted several examples in our sample of extended administrative leave where legal requirements were a significant factor. Other factors, such as investigative actions or

⁶ The notice period can be shortened to 7 days if there is reason to believe that the employee has committed a crime for which a sentence of imprisonment may be imposed.

agency inefficiencies, may have also contributed to the time on administrative leave.

- The National Park Service (NPS) proposed removing an employee in June 2014. The employee had 14 days to respond to NPS' proposal. The employee requested a 60-day extension; NPS granted a 30-day extension. NPS did not receive the employee's final response until November 2014. This employee was ultimately on extended administrative leave for 751 days, at a salary cost of almost \$160,000, before the employee's eventual removal. Time for investigation and agency inefficiencies contributed to the total time on administrative leave.
- NPS proposed removing an employee, who in turn requested and received multiple extensions to respond, multiple requests for information, and multiple submissions of information; this process between NPS and the employee took approximately 5 months for NPS to receive the employee's response. As of November 2016, the case against this employee was still ongoing, and the employee had been on administrative leave for more than 1,100 days at a cost of over \$138,000 through July 2016.
- The U.S. Geological Survey (USGS) placed an employee on administrative leave while the Office of the Solicitor was reviewing removal documentation, which took almost 4 months. The Office of the Solicitor told USGS that it was "overwhelmed with cases, as [it was] operating under a 40 percent deficit of staff to handle the work." The cost to DOI was over \$65,000. The employee was allowed to resign as part of a settlement agreement.
- The U.S. Fish and Wildlife Service (FWS) placed an employee on administrative leave after she entered the discrimination complaint process and requested reasonable accommodations for a medical condition that included a reassignment request. According to FWS officials, the employee did not provide the medical information to support her medical condition in a timely manner, which resulted in more than 270 days of administrative leave at an estimated cost of over \$44,000.

Inefficient Agency Processes

While each case of administrative leave is unique, inefficient agency processes sometimes contributed to the length of time an employee was on administrative leave. The inefficiencies we observed were most often related to using administrative leave as part of the investigative or disciplinary process:

- Indian Affairs acknowledged that inefficient oversight resulted in an employee, who should have been suspended without pay in June 2013, remaining on administrative leave until February 2014. The employee resigned in March 2014—shortly before his proposed removal—after accruing more than 416 days of administrative leave and receiving salary payments in excess of \$43,000.

- NPS placed a U.S. Park Police officer on administrative leave in November 2013 while the officer was under investigation for alleged intoxication while on duty. The officer admitted in January 2014 that he had consumed alcohol while on duty. Despite his admission, NPS did not submit a proposal to remove the officer until August 2014. The employee then had 30 days to respond to NPS' proposal, but NPS did not receive the response until October 2014. NPS did not make a final decision for removal until February 2015. The employee remained on paid administrative leave from November 2013 until February 2015, when he was removed; he accrued more than 400 days of administrative leave and received salary payments in excess of \$100,000.

Discrimination Settlement Agreements

DOI policy does not address the use of administrative leave as part of settlement agreements for discrimination cases with the Equal Employment Opportunity Commission. We identified two cases in our sample, however, that used administrative leave as part of these settlement agreements:

- Indian Affairs entered into a settlement agreement with an employee who was on administrative leave as part of a grievance. Indian Affairs granted the employee 1 year of administrative leave to allow the employee to seek other employment. This use of extended administrative leave cost DOI more than \$200,000 including administrative leave used prior to the agreement.
- NPS entered into a settlement agreement with an employee that required NPS to restore more than 450 hours of annual and sick leave. The resulting timesheet corrections necessitated the time previously recorded as annual and sick leave to be changed to administrative leave.

Insufficient Documentation of Use of Extended Administrative Leave

We found that DOI and its bureaus did not fully document decisions related to the use of extended administrative leave in any of our sample items. More specifically, DOI did not document and maintain (1) the approvals for extended use of administrative leave, (2) that it considered alternative options to administrative leave, or (3) the notifications to employees who would be placed on administrative leave.

DOI's previous policy did not require submission or maintenance of documentation related to use of extended administrative leave. DOI paid more than \$6 million in salaries to 242 employees without sufficient evidence that use of extended administrative leave was appropriate.

Documentation is a necessary part of an internal control system to determine whether controls are in place and operating effectively. The "Standards for Internal Control in the Federal Government," issued by the Comptroller General

of the United States in September 2014, provides criteria for designing, implementing, and operating an internal control system. The standards include documentation and monitoring as necessary parts of an internal control system.

DOI Did Not Document Approvals for Extended Use of Administrative Leave

Previous Policy

DOI's previous policy required bureau or office directors or their deputies to approve use of administrative leave exceeding 45 calendar days and to coordinate with the Office of the Solicitor and OS/OHR. The policy, however, did not require that the approval or the coordination be documented. During our evaluation, we found evidence of approval by the bureau or office director or their deputy in only 1 of our 30 sample cases, but in this case, the director did not sign the approval memorandum. In addition, OS/OHR did not have any records of approval for any of the cases in our sample, and we found evidence of coordination or consultation with the Office of the Solicitor before an employee was placed on extended administrative leave in only 3 of 30 cases.

Without documentation of approval, we could not determine whether DOI and its bureaus followed requirements for approval and coordination of extended administrative leave. Seeking approval from senior management and coordinating with OS/OHR and the Office the Solicitor are essential steps to ensure that extended administrative leave use is appropriate and consistent Departmentwide.

New Policy

DOI's June 2016 policy improved the previous policy by decreasing the period of time after which administrative leave use required approval by senior management from 45 calendar days to 14 calendar days. The new policy also requires bureau or office directors to submit a signed memorandum requesting use of extended administrative leave to OS/OHR through the bureau's human resources office or deputy director. In addition, the policy includes specific guidance on the information that should be included in the memorandum. The new policy does not, however, address who is responsible for maintaining the approval documentation or other documentation related to extended administrative leave. Finally, the new policy also requires OS/OHR to conduct quarterly monitoring reviews of employees on extended administrative leave. The first review, which covered May 29, 2016, through September 17, 2016, identified 24 cases of extended administrative leave—15 cases opened during previous periods and 9 cases opened during this period—and indicated ongoing issues with obtaining approval:

- Only 6 of the 24 cases had been submitted for approval to place an employee on extended administrative leave within the 14-day period as required, and only 4 of those cases actually received approval.

- In one of the approved cases, the employee remained on administrative leave after the expiration of the approved time and was still on administrative leave as of the end of the monitoring period.

We expect that, in time, DOI's and its bureaus' performance will improve as more quarterly reviews are conducted. For example, despite the issues we identified, we also noted two cases from the quarterly review in which DOI ended the employees' administrative leave after bureau human resource officials informed management that an extension to the leave would not be approved.

The new policy does not indicate how DOI should use the results of the quarterly monitoring reviews or who should receive the results of those reviews. For the quarterly reports to be a useful tool, the results need to be analyzed to determine whether bureaus are requesting approval for extended administrative leave and resolving cases expeditiously.

DOI Did Not Document That It Considered Alternatives to Administrative Leave

Previous Policy

In 21 of our 30 sample cases, we found no documentation that DOI and its bureaus considered alternatives to using extended administrative leave (see Figure 3). According to the policy, employees should only be placed on administrative leave when all other options are considered impractical. The previous policy required management to consider alternatives to administrative leave, but it did not require any documentation of that consideration. The absence of documentation does not mean that management did not consider alternatives or that extended administrative leave was used inappropriately, but without it, we could not make a determination.

Bureau	Documentation			Sample Size
	Yes	No	N/A	
National Park Service	3	13	1	17
Indian Affairs	1	3	1	5
Bureau of Land Management	1	2	0	3
U.S. Geological Survey	1	1	0	2
Bureau of Reclamation	0	1	0	1
Bureau of Safety and Environmental Enforcement	0	1	0	1
U.S. Fish and Wildlife Service	1	0	0	1
Total	7	21	2	30

Figure 3. DOI bureaus that documented consideration of alternatives to extended administrative leave.

New Policy

DOI's June 2016 policy requires that management's submission to OS/OHR to request approval for administrative leave of more than 14 days include how management determined that extended administrative leave is the best remedy. More specifically, the documentation should include details as to why the employee's presence in the workplace may be injurious to the employee or others, result in loss or damage to Government property, or jeopardize Government interests. The documentation should also describe why no other alternatives would be appropriate and the Office of Solicitor's recommendation. The new policy does not address who is responsible to maintain this documentation.

DOI Did Not Document Notifications Made to Employees Placed on Administrative Leave

Previous and New Policy

In 11 of our 30 sample cases, the bureaus could not provide us with a copy of the notification to the employee that the employee had been placed on administrative leave, which is required by DOI Policy (see Figure 4). This notification to the employee is important because it outlines the employee's responsibilities while on administrative leave, which includes readiness to return to duty on short notice. If an employee cannot immediately return to work, the employee must request another form of leave, such as annual or sick leave. The new policy did not make any changes to requirements for documenting or maintaining copies of employee notifications.

Bureau	Documentation			Total
	Yes	No	N/A	
National Park Service	8	7	2	17
Indian Affairs	3	1	1	5
Bureau of Land Management	1	2	0	3
U.S. Geological Survey	2	0	0	2
U.S. Fish and Wildlife Service	0	1	0	1
Bureau of Reclamation	1	0	0	1
Bureau of Safety and Environmental Enforcement	1	0	0	1
Total	16	11	3	30

Figure 4. DOI bureaus that documented notification to the employee that the employee had been placed on administrative leave.

DOI Did Not Sufficiently Maintain Documentation

We identified various factors that contributed to DOI not sufficiently maintaining documentation:

- Bureau human resources officials stated that they did not have a clear understanding of what documentation should be retained or who should

retain it. We found this especially true if the case was unrelated to misconduct or did not result in an adverse action.

- Eight of the 30 cases in our sample were not related to employee misconduct and thus not covered by DOI policy governing use of extended administrative leave. Both versions of DOI policy covered approval of the use of extended administrative leave related only to investigations of unacceptable performance or misconduct, and no other uses, such as medical disability or security clearance investigations. As such, neither policy requires documentation for these types of extended administrative leave.
- DOI's previous policy did not require management to document its approval of extended administrative leave, its coordination with the appropriate human resources office or the Office of the Solicitor, or its proof that it considered alternatives to administrative leave. The June 2016 policy requires this documentation.
- Neither policy version addressed how to or who should maintain documentation related to administrative leave use.

Preparing for the Administrative Leave Act of 2016

In December 2016, the President signed into law the Administrative Leave Act of 2016, which includes new Governmentwide requirements for administrative leave. While DOI will have time to implement the new requirements, it should begin preparing for this implementation to ensure that it meets the requirements.

DOI has already taken actions that help it prepare for the Act, such as implementing new pay codes for investigative and notice leave, effective December 2, 2016.⁷ In response to our draft report, DOI issued guidance on the use of these new pay codes on March 2, 2017.

Based on the results of our evaluation, we noted several other impediments that DOI may face in meeting the Act's requirements:

- In nine cases we reviewed, we could not determine the start and end dates for investigations. Because the Act states that investigative leave should not begin before the start of an investigation and should continue no more than 30 work days upon completion of an investigation, appropriate documentation of these dates is critical.
- In seven cases we reviewed, we could not determine when employees received the notification of proposed adverse action as required by both DOI policy and the Act.
- In 13 cases we reviewed, administrative leave continued past the end of the notice period, sometimes by more than 1 year. The Act requires that notice leave should not extend past the end of the notice period.

⁷ These new codes apply to both DOI and Federal customers of the Interior Business Center.

The quarterly monitoring conducted by OS/OHR of extended administrative leave use as a requirement in the new policy could help DOI identify obstacles to meeting the requirements of the Act and monitor progress towards meeting those requirements.

Recommendations

We recommend that the Assistant Secretary for Policy, Management and Budget ensure that OS/OHR:

1. Update DOI's administrative leave policy to cover maintaining documentation related to use of all types of extended administrative leave, to include employee conduct and performance, medical fitness, pending security clearances and background investigations, and use in settlement agreements. The guidance should also specify the office responsible for maintaining the documentation and the period for which it should be maintained.
2. Update DOI's administrative leave policy to include guidance regarding how to use the results of the quarterly monitoring reviews, who should receive the results of those reviews, and who is responsible to ensure appropriate action is taken to properly manage use of extended administrative leave.
3. Update DOI's administrative leave policy to include guidance on the use of the new pay codes for investigative and notice leave and ensure that the guidance is properly communicated to the appropriate personnel throughout the Department.
4. Begin preparing for the Administrative Leave Act of 2016 by reviewing its current policy and making necessary updates to comply with the Act.

Conclusion and Recommendations

Conclusion

DOI has an opportunity to improve how it documents and monitors extended administrative leave. While DOI cannot entirely avoid using extended administrative leave due to ongoing investigations and certain legal requirements, it can better manage its use.

If DOI management does not appropriately maintain documentation related to the use of extended administrative leave, DOI cannot demonstrate that it has properly managed its use of extended administrative leave or that it has not wasted taxpayers dollars by paying employees not to work.

In addition, with the passage of the Administrative Leave Act of 2016 in December 2016, DOI has an opportunity to begin reviewing its policies to ensure compliance with the Act's requirements.

We made four recommendations that we believe will help DOI effectively manage and oversee the use of extended administrative leave, reduce money lost to salary paid out to employees unnecessarily on extended administrative leave, and prepare to implement the requirements of the Administrative Leave Act of 2016. In its response to our draft report, DOI concurred with all four recommendations (Appendix 2). DOI also made technical comments on the draft report, which we incorporated in this final report where appropriate. The table in Appendix 3 shows the current status of the four recommendations.

Recommendations Summary

We recommend that the Assistant Secretary for Policy, Management and Budget ensure that the Office of Human Resources:

1. Update DOI's administrative leave policy to cover maintaining documentation related to use of all types of extended administrative leave, to include employee conduct and performance, medical fitness, pending security clearances and background investigations, and use in settlement agreements. The guidance should also specify the office responsible for maintaining the documentation and the period for which it should be maintained.

DOI Response: DOI concurred with the recommendation and stated that it would update the policy once OPM issues implementing regulations for the Administrative Leave Act.

OIG Analysis: We consider this recommendation resolved but not implemented, and will refer it to PMB for tracking of implementation.

2. Update DOI's administrative leave policy to include guidance regarding how to use the results of the quarterly monitoring reviews, who should receive the results of those reviews, and who is responsible to ensure appropriate action is taken to properly manage use of extended administrative leave.

DOI Response: DOI concurred with the recommendation.

OIG Analysis: We consider this recommendation resolved but not implemented, and will refer it to PMB for tracking of implementation.

3. Update DOI's administrative leave policy to include guidance on the use of the new pay codes for investigative and notice leave and ensure that the guidance is properly communicated to the appropriate personnel throughout the Department.

DOI Response: DOI issued guidance to all DOI human resource directors on March 2, 2017.

OIG Analysis: We consider this recommendation to be closed – resolved and implemented.

4. Begin preparing for the Administrative Leave Act of 2016 by reviewing its current policy and making necessary updates to comply with the Act.

DOI Response: DOI concurred with the recommendation and stated that it would update the policy once OPM issues implementing regulations for the Administrative Leave Act.

OIG Analysis: We consider this recommendation resolved but not implemented, and will refer it to PMB for tracking of implementation.

Appendix I: Scope and Methodology

Scope

Our evaluation reviewed the use of extended administrative leave at the U.S. Department of the Interior (DOI) from January 2013 through July 2016. We performed limited work through December 2016 to review DOI's June 2016 administrative leave policy, the September 2016 quarterly monitoring report, and the Administrative Leave Act of 2016.

Methodology

To accomplish our objectives, we—

- gathered general, administrative, and background information of DOI's administrative leave use;
- reviewed prior reports from the U.S. Government Accountability Office (GAO) and other agencies related to the use of administrative leave, as well as applicable laws, regulations, and policies;
- interviewed officials from DOI's Office of Human Resources, Office of the Solicitor, U.S. Geological Survey (USGS), U.S. Fish and Wildlife Service (FWS), National Park Service (NPS), Bureau of Reclamation (USBR), Indian Affairs (IA), Bureau of Safety and Environment Enforcement (BSEE), and Bureau of Land Management (BLM);
- obtained and analyzed personnel and time and attendance data from the Interior Business Center's (IBC) Datamart for January 2013 to July 2016;
- selected a judgmental sample of 30 employees from USGS, FWS, NPS, USBR, IA, BSEE, and BLM for review. The sample included the 15 longest cases of extended administrative leave, in addition to a random sample of 15 other employees; and
- reviewed personnel actions, administrative leave memorandums, settlement agreements, and proposal and decision documents related to the employees in our sample.

We relied on computer-generated data from the IBC Datamart for identifying employees on extended administrative leave and related salary cost. The IBC Datamart combines data from the Federal Personnel and Payroll System (FPPS) and Quicktime. All of these are part of the FPPS Major Application. Quicktime is the time and attendance system used by DOI. The FPPS system is reviewed annually as part of DOI's financial statement audit and as part of agreed upon-procedures performed for the U.S. Office of Personnel Management (OPM). The FPPS data is also the source for the DOI data in OPM's Enterprise Human Resources Integration system that GAO found sufficiently reliable for its audit. Our review of the sample of 30 employees did not identify any discrepancies in the Datamart data. Based on the results of these reviews, we considered the data sufficiently reliable for our purposes.

We conducted our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

Appendix 2: Department Response to Draft Report

The Department's response to our draft report follows on p. 19.




United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

MAR 23 2017

Memorandum

To: Mary L. Kendall
Deputy Inspector General

From: Mary F. Pletcher 
Deputy Assistant Secretary – Human Capital and Diversity

Subject: Department of the Interior Response to Draft Evaluation Report *Insufficient Guidance on Use of Extended Administrative Leave at the U.S. Department of the Interior* – Report No. 2016-ER-070

Thank you for the opportunity to respond to the Office of the Inspector General (OIG) draft evaluation report on the use of extended administrative leave at the U.S. Department of the Interior. As noted in the report, in the past year, the Department has already taken significant steps in issuing guidance and exercising greater oversight of the use of extended administrative leave. However, given the passage of the Administrative Leave Act in December 2016, the Department recognizes that its policy in this area will need to change further, once implementing regulations have been issued by the U.S. Office of Personnel Management.

The Department concurs with all of the OIG recommendations noted in the draft report. Pursuant to your request, the Department submits a Statement of Actions for implementation of the recommendations in Attachment 1. In addition, the Department submits for your consideration a list of corrections and notes regarding the draft report in Attachment 2, as well as a memorandum responsive to Recommendation 3 in Attachment 3.

If you have any questions, please contact me at (202) 208-4505 or mary_pletcher@ios.doi.gov.

cc: Amy Holley, Acting Assistant Secretary for Policy, Management and Budget
Alexandra Lampros, Financial Specialist, Office of Financial Management
Raymond A. Limon, Director, Office of Human Resources
Karen K. Richardson, Director, Employment and Labor Law Unit, Office of the Solicitor

Attachments:

1. Statement of Actions to Address Office of Inspector General (OIG) Draft Evaluation Report on *Insufficient Guidance on Use of Extended Administrative Leave at the U.S. Department of the Interior* – Report No. 2016-ER-070

2. List of Corrections and Notes on Office of Inspector General (OIG) Draft Evaluation Report on *Insufficient Guidance on Use of Extended Administrative Leave at the U.S. Department of the Interior* – Report No. 2016-ER-070
3. DOI Office of Human Resources Memorandum issued March 3, 2017, *Guidance on Using Administrative Leave Pay Codes*.

Department of the Interior
Statement of Actions to Address Office of Inspector General (OIG) Draft Evaluation
Report on *Insufficient Guidance on Use of Extended Administrative Leave at the U.S.*
***Department of the Interior* – Report No. 2016-ER-070**

Background and Observations

In June 2016, the Department of the Interior (DOI) significantly strengthened its procedures related to extended administrative leave by issuing Personnel Bulletin 16-01, *Modification to Administrative Leave Procedural Guidance*. By implementing Personnel Bulletin 16-01, DOI:

- Reduced the number of days that a Bureau/Office could place an employee on extended administrative leave without Departmental consultation from 45 calendar days to 14 calendar days;
- Initiated new requirements for all requests to place an employee on administrative leave for longer than 14 days, including—
 - Approval by the Deputy Assistant Secretary for Human Capital and Diversity;
 - Criteria that must be met in determining when administrative leave is appropriate;
 - Documented consideration of all alternatives to administrative leave;
 - Consultation with the Office of the Solicitor; and
 - Quarterly monitoring of extended administrative leave use.

The OIG evaluation covers the use of extended administrative leave between January 2013 and July 2016, prior to any instances of extended administrative leave that would have been approved under the new procedures. While the draft evaluation report acknowledges and describes the changes that DOI has implemented since the time period covered by the review, the title of the draft evaluation report does not accurately reflect these changes and leads the reader to believe that oversight of this issue is currently still insufficient. Changing the title of the evaluation report to “Extended Administrative Leave at the U.S. Department of the Interior” would more accurately portray the current state of DOI policy on this issue. In addition, placing stronger emphasis on the changes that DOI has already made in the “Results in Brief” section of the report would clarify that the data and samples reviewed took place prior to the implementation of the new policy.

Furthermore, DOI asserts that the report would more fully portray the use of extended administrative leave if it included information about the final disposition of the example cases cited in the report. We have provided this information in Attachment 2.

Response to Recommendations

Recommendation 1: *Update DOI's administrative leave policy to cover maintaining documentation related to use of all types of extended administrative leave, to include employee conduct and performance, medical fitness, pending security clearances and background investigations, and use in settlement agreements. The guidance should also specify the office responsible for maintaining the documentation and the period for which it should be maintained.*

Response: Concur. The DOI Office of Human Resources (OS/OHR) will update DOI policy related to administrative leave in light of the changes brought by the Administrative Leave Act of 2016, once implementing regulations have been issued by the U.S. Office of Personnel Management (OPM). OPM is required to issue its regulations by September 19, 2016. Agencies must comply with the regulations by June 16, 2018. Currently, OS/OHR maintains documentation of all extended administrative leave requests that have been submitted for approval to the Deputy Assistant Secretary for Human Capital and Diversity, and Bureau/Office servicing human resources offices maintain all supporting documentation. This practice will be documented in the forthcoming policy update, along with the clarifications in coverage included in the OIG's recommendation.

Responsible Official & Title: Raymond A. Limon, Director, OS/OHR

Lead Contact & Title: Agnes Wanderer, Employee Relations and Performance Management Program Manager, OS/OHR

Target Completion Date: June 16, 2018.

Recommendation 2: *Update DOI's administrative leave policy to include guidance regarding how to use the results of the quarterly monitoring reviews, who should receive the results of those reviews, and who is responsible to ensure appropriate action is taken to properly manage use of extended administrative leave.*

Response: Concur. While the results of the quarterly monitoring reviews are currently provided to employee relations leads in all Bureau/Office servicing human resources offices, we agree that elevating the reporting of these results and documenting who is responsible for appropriate action will strengthen the Department's accountability efforts in this area. This guidance will be incorporated into the forthcoming policy updates described in the response to Recommendation 1.

Responsible Official & Title: Raymond A. Limon, Director, OS/OHR

Lead Contact & Title: Agnes Wanderer, Employee Relations and Performance Management Program Manager, OS/OHR

Target Completion Date: June 16, 2018.

Recommendation 3: *Update DOI's administrative leave policy to include guidance on the use of the new pay codes for investigative and notice leave and ensure that the guidance is properly communicated to the appropriate personnel throughout the Department.*

Response: Concur and completed. The Director of OS/OHR issued a memorandum to all DOI Human Resources Directors on March 2, 2017 that provides this guidance. Attachment 3 is a copy of the memorandum.

Responsible Official & Title: Raymond A. Limon, Director, OS/OHR

Lead Contact & Title: Agnes Wanderer, Employee Relations and Performance Management Program Manager, OS/OHR

Target Completion Date: Completed – N/A.

Recommendation 4: *Begin preparing for the Administrative Leave Act of 2016 by reviewing its current policy and making necessary updates to comply with the Act.*

Response: Concur. As discussed in the response to Recommendation 1, OS/OHR will update DOI policy related to administrative leave in light of the changes brought by the Administrative Leave Act of 2016, once implementing regulations have been issued by OPM. OPM is required to issue its regulations by September 19, 2016. Agencies must comply with the regulations by June 16, 2018.

Responsible Official & Title: Raymond A. Limon, Director, OS/OHR

Lead Contact & Title: Agnes Wanderer, Employee Relations and Performance Management Program Manager, OS/OHR

Target Completion Date: June 16, 2018.

Department of the Interior
List of Corrections and Notes on Office of Inspector General (OIG) Draft Evaluation
Report on *Insufficient Guidance on Use of Extended Administrative Leave at the U.S.*
Department of the Interior – Report No. 2016-ER-070

The Department of the Interior (DOI) recommends the following corrections and notes for your consideration to ensure that the draft evaluation report is as accurate and complete as possible. Corrections and notes are referenced by draft report page number.

Page 2

1. In first paragraph of the section entitled “Background,” the second sentence is inaccurate as written. It currently reads:

“Prior to the enactment of the Administrative Leave Act of 2016 in December 2016, there was no statutory authority for using administrative leave, but the U.S. Office of Personnel Management (OPM) provides direction on permissible use.”

Recommended correction:

“Although administrative leave was not expressly referenced in statute prior to the enactment of the Administrative Leave Act of 2016 in December 2016, the authority to grant an excused absence derives from the inherent authority for heads of agencies to prescribe regulations for the government of their organizations (see, e.g., 5 U.S.C. 301-302).”

Page 3

1. In the third paragraph, which summarizes the Administrative Leave Act, the following statement is incorrect:

“Investigative leave may not exceed 90 work days...”

Recommended correction:

“Investigative leave may not exceed 130 work days without Congressional notification...”

Reference: P.L. 114-328 Sec. 1138

- Par. 6329b(b)(3)(A) gives an initial 40 days;
- Par. 6329b(c)(1) gives an additional 90 days;
- Par. 6329b(d)(1) allows for additional extensions beyond the 130 workdays with required Congressional reporting every 30 days.

Page 6

1. For the first case cited as an example on the page (National Park Service), the following recommended text should be added to the paragraph:

“NPS ultimately removed the employee from the agency.”

2. In the third case cited as an example on the page (Bureau of Safety and Environmental Enforcement), rather than stating that “the employee subsequently resigned,” a more accurate description of the case is:

“BSEE removed the employee from Federal service in November 2014. The employee filed an appeal with the Merit Systems Protection Board. Prior to a decision being rendered in the case, the parties reached a settlement wherein the employee’s removal was changed to resignation.”

3. In the first paragraph of the section entitled “Legal Requirements,” one sentence reads:

“For serious adverse actions, such as a removal, suspension of greater than 14 days, or reduction in grade or pay, DOI and its bureaus must provide at least 30 days’ advance written notice of proposed adverse action against an employee.”

This sentence gives the impression that the 30 days’ advance notice is a DOI-only policy requirement. In fact, this is a statutory requirement that applies to all executive branch agencies.

Page 7

1. For the third case example referenced on the page (U.S. Geological Survey), the following recommended text should be added at the end of the paragraph:

“USGS ultimately proposed the employee’s removal and he was separated from the agency.”

Page 8

1. For the first case example referenced on the page (National Park Service), the following recommended text should be added at the end of the paragraph:

“NPS ultimately removed the employee from the agency.”

2. In the second case example referenced on the page (Bureau of Indian Affairs), as currently written, the description causes the reader to draw the conclusion that the employee’s annual salary was \$200,000 (as earlier in the report, a footnote explains that cost estimates were derived from salary costs only). This cannot be accurate, as no DOI employee earns more than \$187,000/year. It is recommended that OIG either revise or more fully explain how it arrived at this cost estimate.

3. In the third case example referenced on the page (National Park Service), the paragraph currently reads:

“NPS entered into a settlement agreement with an employee that allowed the employee to use administrative leave to restore more than 450 hours of the employee’s annual and sick leave.”

Recommended correction:

“NPS entered into a settlement agreement with an employee to restore more than 450 hours of the employee’s annual and sick leave. The resulting timesheet corrections necessitated the time previously recorded as annual and sick leave to be changed to administrative leave.”

4. In the second paragraph of the section entitled “Insufficient Documentation of Use of Extended Administrative Leave,” the statement is made that DOI paid more than \$6 million in salaries *as a result of* insufficient documentation related to extended administrative leave. We object to this characterization. The money was paid as a result of the underlying facts of each case, not as a result of insufficient documentation. While the insufficient documentation may have contributed to the overall dollar amount in the few cases where oversight of ongoing administrative leave was insufficient, the vast majority of this money was paid as a result of properly granted administrative leave necessitated by employee misconduct, settlements, and other reasons as cited.

Page 10

1. In the second paragraph, the last sentence incorrectly states:

“...DOI ended the employees’ administrative leave after OS/OHR informed management that an extension to the leave would not be approved.”

Recommended correction:

“...DOI ended the employees’ administrative leave after the servicing human resources office informed management that an extension to the leave would not be approved.”

2. The third paragraph states that the quarterly reviews should be analyzed and communicated to appropriate parties. The results of each review are currently analyzed in OS/OHR and communicated to employee relations leads in Bureau/Office servicing human resources offices, with requests for follow-up information on cases where no extended administrative leave request was submitted, or where the administrative leave used exceeded the approved timeframe. As noted in Appendix 1 Recommendation 2, OS/OHR will elevate the sharing of future quarterly review results and will document the procedures in forthcoming policy updates.

1. The second bullet states that OIG could not determine when DOI notified the employee of proposed adverse action or when the notice period started as required by both DOI policy and the Act. These dates are always documented in the actual notices of proposed adverse action that are issued to the employee and included in the adverse action case file of the servicing human resources office. If OIG did not request that Bureaus provide the notices of proposed adverse action related to these cases, then it is recommended that this be stated in the report for clarity.
2. The second sentence of footnote 6 currently states:
“DOI communicated the existence of the new codes to the Federal Personnel and Payroll System User Group.”

It is recommended that this sentence be deleted.




United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

MAR 02 2017

Memorandum

To: Department of the Interior Human Resources Directors

From: Raymond A. Limon 
Director, Office of Human Resources

Subject: Guidance on Using Administrative Leave Pay Codes

This memorandum provides guidance on using the administrative leave pay codes available in the Federal Personnel and Payroll System (FPPS). Several recently-added codes will allow the Department to better categorize and track its use of administrative leave and be responsive to forthcoming legal requirements.

Background

In recent years, Congress and the Government Accountability Office have scrutinized agencies' use of administrative leave as a broad category. In 2015, based on pending legislation, the Interior Business Center started work to create several new categories of administrative leave in FPPS. These new pay codes were incorporated into FPPS on December 2, 2016.

Subsequently, Congress passed the Administrative Leave Act of 2016, enacted on December 23, 2016 as Section 1138 of the National Defense Authorization Act for Fiscal Year 2017 (Public Law 114-328). The new law limits agencies' use of administrative leave for general purposes not specifically defined in law to 10 work days per calendar year per employee. It also designates three new categories of paid time off without charge to other leave:

- Investigative Leave: Non-duty paid status for employees who are the subject of an investigation;
- Notice Leave: Non-duty paid status for employees who are in the notice period for a proposed adverse action; and
- Weather and Safety Leave: Non-duty paid status related to all acts of God, terrorist attacks or any other condition that prevents an employee or group of employees from safely traveling to or performing work.

The U.S. Office of Personnel Management will promulgate regulations related to this new law by September 19, 2017. Agencies must comply with the regulations by June 16, 2018.

The new regulations will impact the criteria and approval procedures associated with Investigative Leave and Notice Leave. As a result, the Department will wait until the regulations are issued to change its policy with regard to the criteria and approvals required for placing employees in a paid

non-duty status resulting from an investigation or notice period. In the interim, the Department will continue following Personnel Bulletin 16-01: Modification to Administrative Leave Procedural Guidance to place employees on administrative leave when necessary during an investigation or notice period.

Use of Administrative Leave Pay Codes

The new and existing FPPS administrative leave pay codes allow the Department to prepare to meet some of the requirements of the new law even before the implementing regulations are issued. They will also support the Department in better managing its current use of administrative leave. The following guidance applies to each pay code:

060 – Administrative Leave – Other

Definition: Leave in which an employee is placed when excused from duty without loss of pay or charge to other leave, when the time is not captured by any other established pay code.

Usage: Bureaus should monitor use of this pay code closely, to ensure that it is used appropriately. The total hours used under this pay code will count against the total of 10 work days that agencies may authorize for general administrative leave purposes once the Administrative Leave Act's requirements become effective.

061 – Administrative Leave – Weather

Definition: This pay code may be used when employees are excused from duty due to weather or other emergency situations that are beyond the control of management or employees and which prevent employees from working.

Usage: Previously used primarily for late arrivals, early dismissals, or closures related to weather, the Administrative Leave Act of 2016 specifically defines "Weather and Safety Leave" as a separate leave category. The law expands the use of this new leave type to all acts of God, terrorist attacks, or any other condition that prevents an employee or group of employees from safely traveling to work or performing work at an approved location. This type of leave will not count against the forthcoming 10 work day limit for general administrative leave purposes.

062 – Administrative Leave – Pro Bono

Definition: This new pay code is reserved for the use of attorneys and paralegals in the Office of the Solicitor for performing *pro bono* legal work.

Usage: Pursuant to the Outside Legal Practice policy documented in the Department of the Interior Solicitor's Manual, attorneys and paralegals may use up to 30 hours of administrative leave per year for *pro bono* legal work performed during work hours (II SM 9.3.B-C). As the use of this leave is governed by Departmental policy and is not specifically

defined by law, the total hours used under this pay code will count against the total of 10 work days that agencies may authorize for general administrative leave purposes once the Administrative Leave Act's requirements become effective.

063 – Administrative Leave – Investigations

Definition: Leave in which an employee who is the subject of an investigation is placed.

Usage: Administrative leave for investigations must be used judiciously. Decisions about when it is appropriate to place an employee on administrative leave for this purpose must continue to be made in accordance with Personnel Bulletin 16-01. Provided that the criteria in Personnel Bulletin 16-01 are met, this pay code is to be used from the first day on which the employee is placed on administrative leave pending an investigation until the date when:

- Management has determined that the employee can be returned to duty status;
- Management allows the employee, upon the employee's request, to take leave for which the employee is eligible;
- If the employee is absent from duty without approved leave, the employee is carried in absent without leave status; or
- An adverse action is proposed.

This type of leave will not count against the forthcoming 10 work day limit for general administrative leave purposes.

064 – Administrative Leave – Notice/Adverse

Definition: Leave in which an employee who has been provided notice of a proposed adverse action is placed.

Usage: Administrative leave for investigations must be used judiciously. Decisions about when it is appropriate to place an employee on administrative leave for this purpose must continue to be made in accordance with Personnel Bulletin 16-01. Provided that the criteria in Personnel Bulletin 16-01 are met, this pay code is to be used from the day on which the notice of proposed action is issued to the employee until the date when management may take the adverse action. This type of leave will not count against the forthcoming 10 work day limit for general administrative leave purposes.

068 – Administrative Leave – Blood Donation

Definition: This pay code may be used for employees who serve as blood donors.

Usage: Employees who donate blood to the Red Cross or other recognized blood banks may be excused from duty for up to 4 hours. As the use of this leave is governed by Departmental policy and is not specifically defined by law, the total hours used under this pay code will count against the total of 10 work days that agencies may authorize for general administrative leave purposes once the Administrative Leave Act's requirements become effective.

069 – Administrative Leave – Court

Definition: Court leave is a separate leave category under 5 U.S.C. 6322. It may be used to authorize the absence of an employee from work status for jury duty, or for serving as a witness in a nonofficial capacity on behalf of any party in a judicial proceeding to which the United States, the District of Columbia, or a state or local government is a party.

Usage: This type of leave will not count against the forthcoming 10 work day limit for general administrative leave purposes.

Eliminating New Pay Code for Agency Directed Administrative Leave

In addition to the above pay codes, the code **065 – Administrative Leave – Agency Directed** was also recently added to FPPS at the request of another FPPS customer agency. Due to the fact that the NDAA has not created a new category of leave that would align with this pay code, the Department will not use this code and has requested that the Interior Business Center remove it from all instances of the Quicktime Time and Attendance system used within the Department.

Please review all of your Bureau/Office employees' time and attendance records for pay periods 2016-26 through 2017-06 to ensure that if the 065 code was used for any employees, impacted timesheets are corrected to another appropriate pay code.

Effective Date

This guidance is effective March 5, 2017 (pay period 2017-07).

If you or your staff have questions or need assistance regarding this guidance, please contact Agnes Wanderer, Office of Human Resources, at (202) 208-6107, or via e-mail at agnes_wanderer@ios.doi.gov.

Appendix 3: Status of Recommendations

Recommendation	Status	Action Required
I, 2, and 4	Resolved but not Implemented	We will refer these recommendations to the Assistant Secretary for Policy, Management and Budget to track their implementation
3	Closed – resolved and implemented	None

Report Fraud, Waste, and Mismanagement



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