



Federal Trade Commission Office of Inspector General



Federal Trade Commission's Top Management and Performance Challenges 2025



Office of Inspector General

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

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MEMORANDUM

FROM: Marissa Gould *Marissa Gould*
Acting Inspector General

TO: Andrew Ferguson
Chairman

SUBJECT: FY 2025 Report on the FTC's Top Management and Performance Challenges

The *Reports Consolidation Act of 2000* requires that each agency's inspector general provides an annual summary perspective on the most serious management and performance challenges facing the agency, as well as a brief assessment of the agency's progress in addressing those challenges. The challenges summarized in this document are based either on work conducted by the Office of Inspector General (OIG) or separate observations and discussions with senior leaders at the Federal Trade Commission (FTC).

In Section I, the OIG has identified the following issues as the top management and performance challenges currently facing the FTC:

- 1. Managing Resources Effectively**
- 2. Addressing Challenges to FTC Litigation**
- 3. Combating Evolving Scams and Enhancing the Public's Awareness**
- 4. Securing Information Systems and Networks Amid Evolving Threats, Workforce Shifts, and Shared Services Uncertainty**

In Section II, the OIG has identified Safeguarding Nonpublic Information as a "watch list" item—an issue that does not rise to the level of a serious management and performance challenge but, nonetheless, requires management's continued attention.

The OIG provided a draft of this report to officials from multiple bureaus and offices, whose comments on the FTC's progress in each challenge area were summarized and

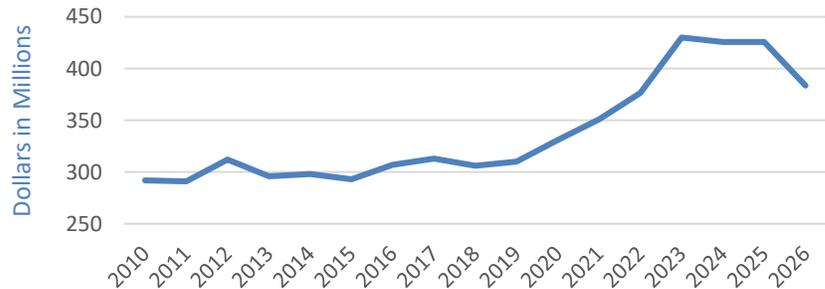
incorporated into this final version. We thank these officials for the thoughtful consideration they provided in comments on this report.

I. The FTC’s Top Management and Performance Challenges

A. Managing Resources Effectively

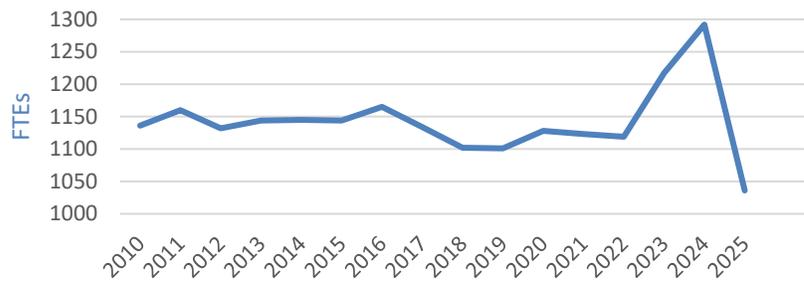
The FTC has faced increasing difficulty in long-term budget and staffing planning due to significant uncertainty in appropriations, rising and variable operational and litigation costs, and new statutory mandates. After a decade of relatively flat funding and stable staffing levels,¹ the agency saw a nearly 40% increase in appropriations between Fiscal Years (FY) 2020 and 2023,² allowing the hiring of approximately 175 new employees. However, in FY 2024, Congress reduced the FTC’s budget by 1%,³ and an executive order provided a 5.2% unfunded pay raise for federal employees,⁴ challenging the FTC’s ability to continue carrying its higher staffing levels. Following a flatlined FY 2025 budget, and

FTC Appropriations by Fiscal Year



Source: Consolidated Appropriations Act, 2026, Pub. L. No. 119-75, Div. E, Title V (Feb 3, 2026), & [FTC Data](#)

FTE (Full Time Equivalents) Per Fiscal Year



Source: [FTC Data](#)

in preparation for further budget reductions, the FTC offered voluntary separation incentives to employees, resulting in the departure of approximately 250 employees during FY 2025—nearly double the average number of annual employee departures. Due to the high number of departures, particularly from critical roles, the agency has slowly begun hiring staff,⁵ with

¹ Between 2010-2019, the FTC’s level of full-time equivalents (FTE) stayed between 1,100 and 1,160, and the FTC’s annual appropriation fluctuated between \$291 and \$310 million. See FTC, [FTC APPROPRIATION AND FULL-TIME EQUIVALENT \(FTE\) HISTORY \(2026\)](#).

² The FTC’s appropriation grew from \$310 million in 2019 to \$430 million in 2023. See FTC, [FTC APPROPRIATION AND FULL-TIME EQUIVALENT \(FTE\) HISTORY \(2026\)](#).

³ The FTC’s appropriation shrunk from \$430 million in 2023 to \$425.7 million in 2024. See FTC, [FTC APPROPRIATION AND FULL-TIME EQUIVALENT \(FTE\) HISTORY \(2026\)](#).

⁴ See [EXEC. OFF. OF THE PRESIDENT, EXEC. ORDER NO. 14113, ADJUSTMENTS OF CERTAIN RATES OF PAY](#) (Dec. 21, 2023).

⁵ Between the change in administration in January 2025 and the end of fiscal year 2025 on September 30, 2025, the FTC onboarded three attorneys. In September 2025, the FTC published announcements on

an increased focus on paralegals to bolster litigation capabilities at a lower cost. Nevertheless, the agency continues to be challenged with maximizing available resources while also focusing on prudent positioning for potential budget fluctuations.⁶

Compounding these challenges are unpredictable and rising building maintenance costs for the FTC's aging headquarters, which opened in 1938. While the FTC forecasts a need for increased spending on building maintenance and critical infrastructure, it is difficult to determine how costly this work will be.

Additionally, planning for expert witness costs continues to challenge the agency. The OIG first included expert witness costs in its annual management challenges report in 2018,⁷ and has since issued two audits related to the agency's expert witness program.⁸ Since that time, the FTC has made significant progress in controlling expert witness costs. During the last five years, the FTC has increased its use of in-house experts,⁹ and has begun requiring case teams to provide justification for engaging outside experts when using in-house experts is not feasible. In 2025, the FTC focused on developing a strategic approach to stabilizing expert witness costs. This included requiring litigation teams to develop case budgets, more closely reviewing expert bills, implementing contract vehicles that increase competition and decrease review time, requesting bids that include both the expert and expert support services, and applying for and receiving a \$14.6 million grant from the federal Technology Modernization Fund to develop a data analysis system. Still, due to unpredictable fluctuations in merger activity and parties' willingness to settle cases and the increasing complexity of FTC litigation, the challenge remains.

In addition, the FTC is working to implement the requirements placed on it by the recently passed TAKE IT DOWN Act (TIDA),¹⁰ which requires digital platforms to remove non-consensual intimate images within 48 hours of a victim's request. To fulfill its responsibility under the TIDA, the FTC must quickly build a secure, trauma-informed reporting system and configure systems capable of handling sensitive content. The FTC estimates that setting up this system, developing victim-centered processes, and hiring properly trained staff will cost approximately \$10 million. Currently, the FTC is conducting internal planning and coordinating with federal agencies and external stakeholders to ensure people who make reports to the FTC about platforms covered by TIDA can access appropriate resources. As part of this effort, the agency is planning development of a dedicated webpage to explain the law and direct victims to support services. Still, to ensure the full realization of the law's

USAJOBS for [attorney](#), [paralegal](#), and [statistician](#) positions. Since the issuance of these announcements, the FTC has onboarded one attorney and is working to onboard 15 attorneys, 10 paralegals, and seven statisticians.

⁶ The Consolidated Appropriations Act, 2026, appropriates \$383.6 million to the FTC for fiscal year 2026, an approximately 10% decrease from the fiscal year 2025 continuing resolution. Pub. L. No. 119-75, Div. E, Title V (Feb 3, 2026).

⁷ See FTC OIG, [2018 MOST SERIOUS MANAGEMENT CHALLENGES FACING THE FEDERAL TRADE COMMISSION REPORT](#) (Sept. 27, 2018).

⁸ See FTC OIG, [AUDIT OF FTC RESOURCES AND SUPPORT FOR EXPERT WITNESS CONTRACTING OFFICER REPRESENTATIVES](#) (May 12, 2023); [AUDIT OF FEDERAL TRADE COMMISSION EXPERT WITNESS SERVICES](#) (Nov. 14, 2019).

⁹ Following the OIG's audit, the FTC Bureau of Competition significantly increased its use of in-house experts, using them for 18 cases between 2022-2025.

¹⁰ Pub. L. No. 119-12, 139 Stat. 55 (May 19, 2025).

protections, the FTC will need the resources to make long-term investments in staffing and infrastructure.¹¹

FTC Comments and Progress in Addressing the Challenge: The agency agrees with the OIG's assessment of both the challenge and the agency's progress in addressing the challenge. The agency notes that it has delegated authority from the U.S. General Services Administration (GSA) to operate, maintain, and repair the FTC headquarters building and works collaboratively with GSA on capital projects and other GSA initiatives. Large projects are coordinated and funded under GSA's capital replacement and modernization responsibilities.

B. Addressing Challenges to Litigation

Recent Supreme Court decisions have significantly affected the FTC's ability to pursue monetary and administrative remedies. In *AMG Capital Management, LLC v. FTC*,¹² the Court ruled that FTC Act Section 13(b)¹³ does not authorize federal courts to award equitable monetary relief, removing a key tool the agency had used for decades to return funds to consumers. As a result, the FTC turned its focus to filing FTC Act Section 19(a)(1)¹⁴ actions, which allows courts to order defendants to pay refunds for violations of an FTC consumer protection rule.¹⁵ Notably, unlike Section 13(b), Section 19 does not provide an avenue to seek monetary relief in anti-competitive conduct cases. For cases that allege deceptive or unfair conduct that does not violate an existing FTC rule, the FTC must first obtain a judgment through FTC administrative proceedings and then file an action in federal court for monetary relief pursuant to FTC Act Section 19(a)(2). This resource intensive and timely process often makes obtaining refunds in these cases challenging. Further, in order to be awarded refunds, Section 19 requires the FTC to quantify how much consumers lost; however, establishing a dollar loss is not always practical.¹⁶ The 2023 *Axon Enterprise, Inc. v. FTC*¹⁷ decision added further complications by allowing respondents to challenge the constitutionality of FTC administrative proceedings in federal court before those proceedings conclude, creating the potential for additional delays and legal uncertainty for consumer protection cases in which the Commission seeks refunds under Section 19(a)(2).¹⁸

Compounding the impacts of *AMG* and *Axon*, the FTC is currently defending an appeal of a Commission order in the Fifth Circuit, in which the appellant, Intuit Inc., is arguing that the

¹¹ The Consolidated Appropriations Act, 2026, requires that the FTC use at least \$10 million of the FTC's \$383.6 million appropriation to implement TIDA. Pub. L. No. 119-75, Div. E, Title V (Feb 3, 2026).

¹² 593 U.S. 67 (2021).

¹³ 15 U.S.C. § 53(b).

¹⁴ *Id.* § 57b(a)(1).

¹⁵ *Id.* § 57b(a)(1).

¹⁶ For instance, the FTC was unable to quantify monetary loss and obtain monetary relief for victims in a settlement with the operator of a pornography-streaming site that failed to block thousands of photos and videos featuring child sexual abuse material and non-consensual material (revenge porn). See Statement of Commissioner Mark R. Meador, *FTC and Utah Division of Consumer Protection v. Aylo Group Ltd. et al.*, Matter Number 2123033 (FTC Sept. 3, 2025), https://www.ftc.gov/system/files/ftc_gov/pdf/2025-09-03-meador-statement-re-mindgeek.pdf.

¹⁷ 598 U.S. 175, 143 S. Ct. 890 (2023).

¹⁸ For a more in-depth analysis of how *AMG* and *Axon* affected FTC litigation, see the [FTC OIG 2024 Top Management and Performance Challenges Report](#) and the [FTC OIG 2023 Top Management and Performance Challenges report](#).

FTC's structure and processes violate separation of powers and due process.¹⁹ Specifically, Intuit contends that the FTC's administrative proceedings were unconstitutional because the administrative law judge (ALJ) who conducted the trial was improperly insulated from presidential removal,²⁰ and the Commission served as both accuser and adjudicator. Further, Intuit asserts that the FTC proceeding violated Article III of the Constitution, arguing that the underlying matter, advertising, is a private right, which requires adjudication by Article III judges. The agency has countered that its proceedings involve public rights, are constitutionally valid, and that administrative law judge protections are consistent with Supreme Court precedent. A ruling against the FTC could limit its use of administrative proceedings, removing the FTC's ability to obtain monetary relief for consumers in Section 19(a)(2) deceptive acts and practices cases. Following a ruling against the FTC, the FTC would be limited to obtaining monetary relief for consumers only where it could bring a Section 19(a) case in federal court alleging a rule violation.

The FTC faces additional uncertainty as it awaits the Supreme Court's decision in *Trump v. Slaughter* as to whether the FTC Act's for-cause removal protections for commissioners are constitutional.²¹ This decision has the potential to impact the structure of the FTC and the way it operates. The Supreme Court is expected to issue a decision during the early summer of 2026.

FTC Comments and Progress in Addressing the Challenge: The agency reports continuing to make progress in addressing the effects of AMG. For consumer protection cases, the agency has focused on actions alleging violations of laws, allowing courts to order consumer redress under Section 19(a)(1). In consumer protection cases where Section 19(a)(1) redress is not available and in competition matters, the FTC has partnered with state law enforcement agencies with authority to obtain consumer redress and/or monetary relief for consumers. While the agency agrees with the OIG's assessment that *Axon* added complications and the potential for delay in administrative cases, the agency notes that courts have, thus far, rejected or declined to address claims challenging the constitutionality of the agency's adjudicative processes.

Regarding the anticipated Supreme Court decision in *Trump v. Slaughter*, the FTC—based on its experience operating under the Supreme Court's stay of the district court order reinstating Commissioner Slaughter following her removal by the President—asserts that a decision affirming the President's removal power will not affect the FTC's day-to-day operations. The agency notes that the Commission has proactively ratified all Commission actions in which Commissioner Slaughter participated following the district court's order to reinstate her, mitigating the risk of potential legal challenges to those actions.

C. Combating Evolving Scams and Enhancing the Public's Awareness

The FTC continues to confront the growing volume and evolving tactics of domestic and foreign scams targeting American consumers. Imposter scams remain the most reported fraud category and include scammers using fake alerts, spoofed calls, and impersonation

¹⁹ *Intuit v. FTC*, No. 24-60040 (5th Cir. 2023)

²⁰ ALJs with tenure protections are insulated from presidential removal and can only be removed for cause with appeal rights to the Merit System Protection Board. See 5 U.S.C. § 7521.

²¹ 146 S. Ct. 18 (Sept. 22, 2025).

of government officials (including FTC officials) to deceive consumers, particularly older adults.²² In the first nine months of 2025, the FTC received 840,409 imposter scam reports—nearly matching the 847,237 reports received in all of 2024.²³ Also, in the first nine months of 2025, the FTC received 65,771 foreign scam²⁴ reports, compared to 67,883 in all of 2024, a pace projecting an approximately 17 percent increase from 2024.²⁵

The FTC takes a multifaceted approach to protecting American consumers from these scams. The FTC has expanded its public education and outreach efforts, including through paid radio, digital, and print advertising, public education campaigns focused on scam and fraud prevention, alerts sent directly to consumers, and joint outreach efforts with other federal, state, and local agencies. In addition, the FTC continues to build on the work of the Scams Against Older Adults Advisory Group—a group it formed in 2022 comprised of representatives from federal, state, and local agencies and private business—to identify and stop scams from disproportionately affecting older adults.²⁶

The FTC also has focused on enforcing the newly finalized (April 2024) Impersonation Rule, which prohibits the impersonation of businesses and government entities. Since the rule went into effect, the FTC has enforced the rule in 11 cases, securing either temporary restraining orders (TROs) or injunctions in these cases. Recently, the FTC obtained a TRO against a group of companies that the FTC alleges had been falsely impersonating government agencies—such as the IRS, deceptively promising tax debt relief, and sending threats to consumers about their debts. The FTC alleges that the defendants were using these tactics to cheat consumers out of tens of millions of dollars every year. To protect consumers during the litigation, a TRO was put in place.²⁷ In addition, the FTC worked over the past year with domain registrars to take down 13 websites impersonating the FTC.²⁸

The FTC also has made strides addressing foreign scams. The Commission has noted that, although it has the “authority to enforce the Federal Trade Commission Act against foreign businesses whose activities have a nexus to the United States, international enforcement is often both difficult and expensive.”²⁹ The FTC has turned to targeting companies with an American presence that facilitate such scams, with a particular focus on companies that process the payments for foreign scammers. Recently, the FTC was successful in obtaining two settlements against payment processor companies with an American presence, Nexway, Inc. and Paddle.com. The Nexway settlement prohibits Nexway from any further

²² From January to September 30, 2025, consumers reported 332,796 government imposter scams, of which 10,521 were imposter scams of FTC officials. See FTC [Consumer Sentinel Fraud Report tableau graphic & FTC Consumer Sentinel Government Imposter Scams tableau graphic](#).

²³ See [FTC Consumer Sentinel Fraud Report tableau graphic](#).

²⁴ Defined as reports filed by customers in the United States against foreign businesses.

²⁵ See [FTC Consumer Sentinel International Reports tableau graphic](#).

²⁶ See the [Advisory Group's work on a webpage](#) on the FTC's website. For additional in-depth analysis of the group's work and other coordinated efforts the FTC is involved in to combat scams against older adults, see the [FTC's Protecting Older Consumers 2024-2025 Report](#).

²⁷ See *FTC v. Am. Tax Serv.*, No. 2:25-cv-01894-GMN-EJY, Dkt. No. 9 (D. Nev. Oct. 6, 2025) (granting TRO).

²⁸ See FTC, [FTC HIGHLIGHTS ACTIONS TO PROTECT CONSUMERS FROM IMPERSONATION SCAMS](#) (April 4, 2025).

²⁹ See FTC, [STATEMENT OF CHAIRMAN ANDREW N. FERGUSON, JOINED BY COMMISSIONERS MELISSA HOLYOAK AND MARK R. MEADOR IN THE MATTER OF PADDLE.COM MATTER NUMBER 2223154](#) (June 16, 2025).

payment laundering, requires the company to closely monitor other high-risk clients for illegal activity, and to pay for consumer redress. The FTC has already issued \$610,000 in refunds to consumers from the settlement.³⁰ The Paddle.com settlement requires the company to pay \$5 million—which will be used to provide refunds to consumers,³¹ permanently bans Paddle from processing payments for tech-support telemarketers and requires Paddle to closely monitor other high-risk clients for illegal activity.³²

FTC Comments and Progress in Addressing the Challenge: The agency agrees with the OIG's assessment of both the challenge and progress made to address the challenge. The FTC will continue to collaborate with its federal partners and others to combat impersonation scams, including coordinating on consumer education and outreach, law enforcement, and other anti-fraud initiatives. For example, the FTC is highlighting to its partners the effectiveness of placing government impersonation warnings on websites like FTC.gov. Consumers continue to report to the FTC that these warnings have successfully alerted them to FTC impersonations and prevented them from losing money to scams. The FTC will also continue to take aggressive law enforcement actions against those who violate the new Impersonation Rule.

D. Securing Information Systems and Networks Amid Evolving Threats, Workforce Shifts, and Shared Services Uncertainty

In FY 2025, the FTC managed notable cybersecurity challenges while continuing to fulfill its mission. A condensed timeline for the Federal Information Security Modernization Act (FISMA) audit required the agency to shift resources from other planned initiatives to meet the deadline. Additionally, changes in staffing—including retirements of experienced personnel and adjustments in roles—introduced added complexity for the Office of Chief Information Officer (OCIO).³³ These changes prompted team members to quickly broaden their skills and take on expanded responsibilities.

Building on these efforts, the FTC has taken proactive steps to strengthen resilience. The agency enhanced its phishing exercise program to improve staff awareness and response,

³⁰ See FTC, [FTC SENDS REFUNDS TO CONSUMERS HARMED BY A TECH SUPPORT SCAM FACILITATED BY PAYMENT PROCESSOR NEXWAY](#) (Feb. 8, 2024).

³¹ The FTC anticipates issuing redress payments in late 2026.

³² See FTC, [PADDLE WILL PAY \\$5 MILLION TO SETTLE FTC ALLEGATIONS OF UNFAIR PAYMENT-PROCESSING PRACTICES AND FACILITATION OF DECEPTIVE TECH-SUPPORT SCHEMES](#) (June 16, 2025).

³³ In calendar year 2025, OCIO experienced significant leadership transitions, including the departure of key federal personnel: Deputy Chief Information Officer (DCIO) [SES]; Acting Mission Success Lead [GS-15] (concurrent with DCIO role); Deputy Chief Information Security Officer (DCISO) [GS-15]; Acting Information System Security Program Manager (ISSPM) [GS-15] (concurrent with DCISO role); and Information System Audit Lead [GS-14]. These departures represent critical positions impacting governance, cybersecurity, and audit oversight functions within OCIO.

advanced its Zero Trust Architecture,³⁴ and expanded its Identity, Credential, and Access Management (ICAM) program to better control system access and verify user identities.³⁵

The FTC is focused on staying ahead of cybersecurity threats posed by rapidly evolving artificial intelligence technologies, adopting an approach that balances innovation with robust protection of systems and data. To that end, the agency is working with cybersecurity vendors to understand how commercial tools are adapting to AI-driven threats. These efforts occur against a backdrop of uncertainty surrounding shared cybersecurity services—such as the Continuous Diagnostics and Mitigation (CDM) program and FedRAMP—and reduced funding for these programs.³⁶

To mitigate risk, the FTC is documenting costs and preparing unfunded requirements in case CDM support is curtailed, while also monitoring cloud vendor performance and reporting issues to the General Services Administration (GSA). Although these actions support resilience, the reduced availability of shared services has complicated long-term planning and placed additional burdens on the FTC's internal cybersecurity and compliance teams.³⁷

FTC Comments and Progress in Addressing the Challenge: OCIO agrees with the OIG's assessment of the challenges described in the report. Increasingly sophisticated adversaries, proliferation of malicious AI tools pose an increased cyber risk environment. Over the past year, the FTC has taken steps to maintain stable IT operations despite staffing changes by redistributing responsibilities and increasing cross training so teams can support one another as needed. The agency also continued strengthening its cybersecurity posture by improving how employees access systems securely and advancing work to better track and manage agency devices, which helps the FTC identify issues more quickly and maintain visibility into its technology environment. While federal shared cybersecurity services remain stable, OCIO continues to plan for potential changes and seeks ways to manage costs

³⁴ The National Institute of Standards and Technology (NIST) has defined Zero Trust Architecture as a cybersecurity framework designed to address modern threats and the limitations of traditional perimeter-based security models. See NIST, Special Pub. 800-207, [ZERO TRUST ARCHITECTURE](#) (2020).

³⁵ NIST has defined ICAM as encompassing policies, processes, and technologies for managing identities, issuing secure credentials, and controlling access to systems and resources. See NIST, Special Pub. 800-63-4, [DIGITAL IDENTITY GUIDELINES](#) (2025).

³⁶ The Federal Risk and Authorization Management Program (FedRAMP) is a U.S. government-wide cybersecurity initiative that provides a standardized, reusable approach to security assessment, authorization, and continuous monitoring for cloud products and services used by federal agencies. Established under federal policy and codified by the FedRAMP Authorization Act, the program ensures consistent cloud security and compliance across the federal government. FedRAMP leverages NIST standards to promote risk-based security practices, reduce duplicative assessments, and accelerate secure cloud adoption. The program's modernization is guided by OMB Memorandum M-24-15, which directs agencies to adopt uniform security authorization processes for cloud services, strengthen continuous monitoring, and implement automation to enhance efficiency and resilience against evolving cyber threats. See OMB, [OMB MEMORANDUM M-24-15, MODERNIZING THE FEDERAL RISK AND AUTHORIZATION MANAGEMENT PROGRAM](#) (2024).

³⁷ OCIO's ability to deliver timely and effective IT services has been impacted by limited resource availability from federal shared service providers, including the Department of Justice (DOJ) and the General Services Administration (GSA).

without reducing security. Across all initiatives, OCIO remains focused on ensuring the resilience and protection of the FTC's systems and data.

II. Watch List

The OIG also maintains a “watch list,” for issues that fall short of a serious management and performance challenge but still require management’s continued attention. Currently, there is one “watch list” issue.

Safeguarding Nonpublic Information

Safeguarding nonpublic information (NPI), such as draft enforcement actions, confidential business data, and internal deliberations, is critical to the FTC’s mission. Unauthorized disclosures, or “leaks,” can harm the agency’s reputation, disrupt enforcement, and erode public trust. Even isolated incidents can have serious consequences, especially in high-profile cases. In the past 15 years, the issue has drawn attention from the media, Congress, and FTC officials during periods when suspected leaks surge. Following two of these surges, the OIG conducted oversight aimed at protecting NPI and reducing leaks in 2013 and 2021.³⁸

In response to the OIG’s oversight work in 2021, the FTC, among other things, tightened its controls on access to NPI in communications and at meetings, developed policies and procedures to reduce unauthorized disclosures of NPI, and created and presented training to reinforce expectations. FTC leadership also has periodically communicated to staff the importance of protecting sensitive information.

Despite the FTC’s efforts, the FTC saw another surge in suspected leaks in 2024 and early 2025. Although this surge subsided by spring 2025, the OIG has announced an Audit of FTC Controls Over Sensitive Information to assess the effectiveness of the FTC’s internal controls for safeguarding sensitive data and ensuring compliance with federal policies on NPI.

³⁸ See FTC OIG, [MANAGEMENT ADVISORY ON CONTROLLING AND PROTECTING SENSITIVE FTC INFORMATION](#) (2021) (recommending that the FTC develop policies and practices within the bureaus related to limiting the sharing and maintenance of NPI, incorporate the use of encrypted messaging and password protection for the delivery of documents and communications that it considers most sensitive, and develop a more comprehensive strategy for communications and training related to prohibitions of NPI disclosures).