



OFFICE OF THE INSPECTOR GENERAL

U.S. NUCLEAR REGULATORY COMMISSION

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Audit of NRC's PMDA and DRMA Functions to Identify Program Efficiencies

OIG-17-A-18

July 3, 2017



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

**OFFICE OF THE
INSPECTOR GENERAL**

July 3, 2017

MEMORANDUM TO: Victor M. McCree
Executive Director for Operations

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

SUBJECT: AUDIT OF NRC'S PMDA AND DRMA FUNCTIONS TO
IDENTIFY PROGRAM EFFICIENCIES (OIG-17-A-18)

Attached is the Office of the Inspector General's (OIG) audit report titled *Audit of NRC's Program Management, Policy Development and Analysis Division (PMDA) and Division of Resource Management and Administration (DRMA) Functions to Identify Program Efficiencies*.

The report presents the results of the subject audit. Following the June 22, 2017, exit conference to discuss the revised discussion draft report, agency staff indicated that they had no formal comments for inclusion in this report.

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

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at (301) 415-5915 or Eric Rivera, Team Leader, at (301) 415-7032.

Attachment: As stated



Office of the Inspector General

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

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Results in Brief

Why We Did This Review

Many NRC offices maintain corporate support through PMDA and DRMA functions. The PMDA function at NRC headquarters and the DRMA function at NRC regional offices manage service delivery in support areas.

NRC is presently facing significant management and performance challenges such as tight and reduced budgets and realignment of program offices. To meet these program challenges, NRC must efficiently and effectively use its resources.

NRC has been proactive in identifying areas in which scarce program resources could be spent in the most economical and effective manner through external independent assessments. In addition, NRC established a Mission Support Task Force to identify opportunities to better optimize the expenditure of agency resources allotted to these programs.

The audit objective was to determine if the activities performed by NRC's PMDA and DRMA programs produce the intended results from their operational processes in a manner that optimizes the expenditure of agency resources.

Audit of NRC's PMDA and DRMA Functions to Identify Program Efficiencies

What We Found

Since the realignment between regional and headquarters PMDA and DRMA functions, administrative functions have not been performed in a manner consistent with policies and procedures governing the revised processes, roles, and responsibilities. For example, in the absence of an NRC approved policy or procedure, some PMDA and DRMA offices created their own respective processes for supporting budget formulation. In those instances, processes were not consistent with the established agency wide budget formulation process.

While policies and procedures for budget formulation exist, the objectives of the related recommendation are to (1) clearly establish and document roles and responsibilities for all individuals managing or supporting budget formulation activities, (2) gain a mutual understanding of centralized budget formulation activities within the Office of the Chief Financial Officer (OCFO), and (3) ensure consistent office processes for budget formulation, as well as a streamlined and reduced effort for developing formulation deliverables.

What We Recommend

The report makes one recommendation to complete implementation of all Mission Support Task Force recommendations that may assist in optimizing the use of resources and result in improving standardization and centralization throughout the agency. Management is in agreement with the finding and recommendation in this report.

TABLE OF CONTENTS

ABBREVIATIONS AND ACRONYMS	i
I. BACKGROUND	1
II. OBJECTIVE	5
III. FINDING	5
NRC has not fully implemented the Mission Support Task Force Report Recommendations	5
Recommendation(s)	8
IV. AGENCY COMMENTS	9
 APPENDIXES	
A. OBJECTIVE, SCOPE, AND METHODOLOGY	10
B. MISSION SUPPORT TASK FORCE RECOMMENDATIONS	13
 TO REPORT FRAUD, WASTE, OR ABUSE	19
COMMENTS AND SUGGESTIONS	19

ABBREVIATIONS AND ACRONYMS

ADM	Office of Administration
BFS	Budget Formulation System
DRMA	Division of Resource Management and Administration
EDO	Executive Director for Operations
FTE	Full Time Equivalent
FY	Fiscal Year
GAO	U.S. Government Accountability Office
IT	Information Technology
NAPA	National Academy of Public Administration
NRC	Nuclear Regulatory Commission
OCFO	Office of the Chief Financial Officer
OCHCO	Office of the Chief Human Capital Officer
OCIO	Office of the Chief Information Officer
OIG	Office of the Inspector General
PMDA	Program Management, Policy Development and Analysis Division
TABS	Transforming Assets into Business Solutions

I. BACKGROUND

Executive Director for Operations

The Executive Director for Operations (EDO) is the Nuclear Regulatory Commission's (NRC) chief operating officer and is authorized and directed to discharge operational and administrative functions necessary for day-to-day operations. Under the EDO, the agency has several administrative corporate support offices including the Office of Administration (ADM), the Office of the Chief Human Capital Officer (OCHCO), and the Office of the Chief Information Officer (OCIO). In addition, many EDO offices maintain corporate support typically called the Program Management, Policy Development and Analysis (PMDA) Division, or the Division of Resource Management and Administration (DRMA)¹.

Corporate Support Offices Responsibilities

The corporate support offices (ADM, OCHCO, and OCIO) perform human resources, information technology (IT), and other tasks for the agency and for portions of the program offices. The PMDA function at NRC headquarters offices and the DRMA function at NRC regional offices manage service delivery in such support areas as (1) administrative services, (2) human capital, (3) budget execution, (4) contract management, and (5) information management and technology.

The PMDA and DRMA organizations exist across NRC, and evolved to address individual office support needs depending on each office's specific mission and functions. They perform functions that are specific to their organization and common across all PMDA and DRMA supported offices.

PMDA and DRMA Budget Information

For Fiscal Year (FY) 2017, approximately 86 and 90 Full Time Equivalents (FTEs) were dedicated to PMDA and DRMA activities respectively. Of the \$181 million FY 2017 budget for the four regional offices, approximately

¹ The Region I group is the Division of Resource Management or DRM.

\$47 million or 26 percent was for DRMA divisions. Also, for FY 2017, of the \$312.8 million headquarters program offices' budget, approximately \$32.4 million or 10 percent was budgeted for PMDA divisions. NRC did not maintain this budget allocation information for PMDA and DRMA prior to FY 2017.

NRC Changes and Challenges

NRC is presently facing significant management and performance challenges² concerning nuclear reactor regulation, nuclear materials, radioactive waste programs, and management of IT and administrative functions. Meeting these challenges will involve operating under tight and reduced budgets, realignment of program offices, and providing consolidated and adequate work space. To meet these program challenges, NRC must efficiently and effectively use its resources to meet its mission and strategic goals while providing adequate infrastructure to accommodate staff.

Internal Initiatives To Improve Efficiency and Effectiveness

NRC has taken steps to save costs while maintaining operational effectiveness and efficiency. In 2010, NRC initiated the Transforming Assets into Business Solutions (TABS) effort with the goal of making NRC more efficient and effective by consolidating and improving business practices.

During June 2014, NRC initiated Project Aim (formerly Project Aim 2020). Project Aim's focus was to improve NRC's operational efficiency, agility, streamlining, and culture.³ Staff gathered input from internal and external stakeholders to forecast the future state of the agency (e.g., workload, FTE, operational environment). NRC anticipates this initiative will provide an opportunity to improve by examining what it does and how it does it, and to use expertise and creativity to ensure it is efficiently accomplishing its safety and security mission.

In addition, Project Aim seeks to anticipate future changes and improve the agency's ability to respond more nimbly. Project Aim has helped to

² See OIG Report 17-A-01, *Inspector General's FY 2017 Assessment of the Most Serious Management and Performance Challenges Facing the Nuclear Regulatory Commission*, October 3, 2016.

³ NRC's Commission supports Project Aim and its charter.

identify activities that are no longer required through re-baselining efforts and developed a *Strategic Workforce Plan* that maps the current workforce to the projected future state of the agency workforce and workload needs. Project Aim has also promoted improvements to the planning and budget formulation and execution processes. For example, the Project Aim task on Fees Transparency and Simplified Calculations included a subtask to “Explore possible revisions to the budget formulation and execution processes including guidance documents for FY 2018 to better align with fee rule data requirements.”

External Independent Assessments

In October 2014, NRC contracted with the National Academy of Public Administration (NAPA) to conduct a 4 week independent evaluation of Project Aim. NAPA viewed the Aim report to be significant and stated the Aim report can and should be used as a critical roadmap to guide an integrated set of significant agency transformation projects critical to NRC's long term future.

Additional Reviews

The Project Aim evaluation of corporate support functions in regional offices noted some efficiencies. However, the EDO and Project Aim steering committee concluded that support functions in NRC headquarters and regional offices required additional focus to identify resource and process efficiencies across the agency in the area of mission support. By memorandum dated July 2016, the EDO created a Mission Support Task Force (Task Force) to assess, standardize, and centralize support staff functions. The goal of this Task Force was to identify and evaluate opportunities to standardize functions and approaches among headquarters program offices, PMDAs and regional DRMAs and identify and evaluate the relative effectiveness and efficiency of performing those functions locally or centrally. The Task Force report, issued December 29, 2016, contained 27 recommendations. It concluded that the implementation of the recommendations in the “Project Aim – Evaluation of Corporate Support Functions in the Regional Offices – Results and Recommendations,” and the Task Force's recommendations in the Task

Force report is key to enabling proposed PMDA and DRMA resource efficiencies. On May 11, 2017, the Mission Support Implementation Working Group issued an implementation plan that provides in detail the steps to be taken before a recommendation is launched, during the launch, and post launch.

II. OBJECTIVE

The audit objective is to determine if the activities performed by NRC's PMDA and DRMA programs produce the intended results from their operational processes in a manner that optimizes the expenditure of agency resources.⁴ Appendix A of this report provides information on the audit scope and methodology. NRC's OIG retained the services of Acuity Consulting, Inc., to perform this audit.

III. FINDING

The NRC's PMDA and DRMA programs generally produce the intended results from their operational processes. NRC has been proactive in identifying areas in which scarce resources could be spent in the most economical and effective manner. For example, NRC established a Task Force to identify opportunities to better optimize the expenditure of agency resources allotted to these programs. We assessed the Task Force Report's 27 recommendations and believe, with proper and timely implementation, they will assist in optimizing the economical and effective expenditure of agency resources and help NRC achieve its fiduciary goals.

NRC Has Not Fully Implemented The Mission Support Task Force Report Recommendations

Federal standards require agencies to implement control activities, including policies, procedures, and techniques, to enforce directives designed to achieve objectives and address risks. However, agency-wide policies and procedures pertaining to areas such as budget formulation are performed inconsistently. This occurred because NRC has not fully implemented all of the Mission Support Task Force Report recommendations designed to streamline and improve internal controls related to improving efficiency and effectiveness of PMDA and DRMA

⁴ See *Limitations on the Scope of Our Work* in Appendix A of this report.

operations. While most of the recommendations are scheduled to start during calendar year 2017, there are two recommendations that are not scheduled to start until calendar year 2018 and one not until calendar year 2019. As a result, NRC's internal controls may be compromised and policies and procedures may not be as effective and efficient as intended. Furthermore, there is increased potential for a wasting of resources, declining productivity and decreasing efficiency and effectiveness of NRC's administrative support operations.

What Is Required

U.S. Government Accountability Office (GAO) Standards

GAO's *Standards for Internal Control in the Federal Government* requires management to design control activities to address the entity's objectives and risks to achieving an effective internal control system. Control activities are the policies, procedures, techniques, and mechanisms that enforce management's directives to achieve the entity's objectives and address related risks. Action to ensure the proper execution of financial and nonfinancial transactions is an example of a control activity. This includes ensuring policies, processes, and procedures are standardized and executed in accordance with management's intent on a consistent basis. It also includes having an organizational structure designed to ensure those policies, processes, and procedures are carried out in the most efficient and effective manner possible.

What We Found

Agency-wide Administrative Functions are Not Performed in a Manner Consistent with NRC Policies and Procedures

Since the realignment between regional and headquarters PMDA and DRMA functions, administrative functions have not been performed in a manner consistent with policies and procedures governing the revised processes, roles, and responsibilities. For example, in the absence of an NRC approved policy or procedure, some PMDA and DRMA offices created their own respective processes for supporting budget formulation.

In those instances, processes were not consistent with the established agency-wide budget formulation process. While policies and procedures for budget formulation exist, the objectives of the related recommendation are to (1) clearly establish and document roles and responsibilities for all individuals managing or supporting budget formulation activities, (2) gain a mutual understanding of centralized budget formulation activities within the Office of the Chief Financial Officer (OCFO), and (3) ensure consistent office processes for budget formulation, as well as a streamlined and reduced effort for developing formulation deliverables.

Why This Occurred

Several Mission Support Task Force Report Recommendations Remain Unimplemented

In the Task Force Report, NRC has prepared a comprehensive plan to standardize and centralize support staff functions as addressed in the report's 27 recommendations. However, as of May 2017, agency management has not begun implementing all of the recommendations designed to streamline and improve internal controls including those designed to improve efficiency and effectiveness of the PMDA and DRMA operations (See Appendix B). NRC officials stated budgetary constraints have precluded the agency from starting all of the recommendations at this time.

Why This Is Important

Weakened Internal Controls

The lack of streamlined, standard, and centralized processes and procedures has the potential to weaken NRC's internal controls and may prevent transactions, policies, processes, and procedures from effectively being carried out as management intended. This may also increase the potential waste of resources, decrease productivity, and reduce efficiency and effectiveness of NRC's administrative support operations.

We assessed the Mission Support Task Force Report's 27 recommendations and believe, with proper and timely implementation, they will assist in optimizing the economical and effective expenditure of agency resources and help NRC achieve its fiduciary goals (see Appendix B).

Recommendations

OIG recommends that the Executive Director for Operations

1. Complete implementation of all Mission Support Task Force recommendations that may assist in optimizing the use of resources and result in improving standardization and centralization throughout the agency.

IV. AGENCY COMMENTS

OIG issued its discussion draft report on May 15, 2017. Subsequently, OIG met with agency staff to discuss specific aspects of the report. As a result of that meeting, OIG issued a revised discussion draft on June 6, 2017. At an exit conference on June 23, 2017, the agency had no comments on the revised discussion draft.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The audit objective is to determine if the activities performed by NRC's PMDA and DRMA programs produce the intended results from their operational processes in a manner that optimizes the expenditure of agency resources.

Scope

This audit focused on the operations of the DRMA offices in the regions, PMDA offices in headquarters, and selected corporate support offices in headquarters. Specifically, our DRMA scope included interviews at Regions I, II, III, and IV. Our PMDA scope included interviews of staff in the Offices of Nuclear Reactor Regulation, Nuclear Regulatory Research, Nuclear Security and Incident Response, New Reactors, Nuclear Material Safety and Safeguards, Administration, the Atomic Safety and Licensing Board Panel, and the Advisory Committee on Reactor Safeguards. Our corporate support offices scope included interviews of staff in ADM, OCFO, and OCHCO. We conducted this performance audit from October 2016 to May 2017 at NRC headquarters (Rockville, MD) and at NRC's four regional offices in King of Prussia, PA; Atlanta, GA; Lisle, IL; and Arlington, TX.

Limitations on the Scope of Our Work

There were limitations on the scope of our work; namely we requested budget information from the agency relating to that portion of NRC's budget for FY's 2014-2016, that was allocated to each PMDA and DRMA office. We intended to perform several trend/ratio analyses on these budgets and authorized FTEs. However, we were informed that the agency only captured this information for FY 2017. Prior to the formulation of FY 2017 resources, entering resources into the Budget Formulation System (BFS) by division was optional and not required. Prior to FY 2017, none of the major NRC business lines had FTE broken

down to the Division level in BFS. Beginning in FY 2017, agency budget instructions included the requirement for all business lines and offices to be entered into BFS with the itemization of FTE down to the division level. Therefore, we could not perform these critical analyses or report on other information related to this subject.

Methodology

To accomplish the audit objective, we reviewed the following guidance and information:

- Transforming Assets into Business Solutions Reports
- Project Aim 2020 Reports
- Mission Support Task Force Report
- Mission Support Implementation Working Group Implementation Plan
- FY 2017 PMDA and DRMA budget and FTE Data
- National Academy of Public Administration Report
- Numerous acknowledged industry best practice guides on downsizing
- Reports detailing how other Federal agencies downsized
- Relevant NRC OIG Audit Reports
- GAO's Standards for Internal Control in the Federal Government

We conducted 83 interviews of NRC staff and management to gain an understanding of the roles and responsibilities of PMDA and DRMA staff at NRC Headquarters and in Regions I, II, III, and IV. In addition, we attended Relevant Town Hall Meetings. OIG staff auditors also in Regions I, II, III, and IV coordinated activities and organized interviews and other required activities.

We reviewed and analyzed internal controls related to the audit objectives. Throughout the audit, we considered the possibility of fraud, waste, or abuse in the program.

We conducted this performance audit in accordance with generally accepted government auditing standards except for the non-availability of NRC budget information for FY's 2014-2016, that was allocated to each PMDA and DRMA office stated in our scope. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained

provides a reasonable basis for our finding and conclusions based on our audit objective.

The audit was conducted by McCoy Williams, Jr., President, CEO; James Short, Partner; TaVonna Serious, Senior Manager; and Omar Chenzaie, Staff Auditor; from Acuity Consulting, Inc.

MISSION SUPPORT TASK FORCE RECOMMENDATIONS

	Recommendation	Timeline ⁵	Launch Date ⁵ :	Lead Office
	Financial – Budget Formulation			
1	Review the roles and responsibilities of the centralized budget formulation analyst and PMDA and program staff defined during centralization. If necessary, update documentation relating to roles and responsibilities to (1) ensure continued alignment between OCFO and HQ offices and regions, (2) eliminate any duplication of effort, and (3) optimize efficiencies gained by centralizing budget formulation functions.	Est. Start: June/July 2017 Est. End: TBD	October/November 2017	OCFO
	Financial - Budget Execution			
2	Improve and standardize budget execution processes, reports, tools, and technology by engaging key subject matter experts as partners with OCFO to reduce the level of effort related to these activities. Take planned system and reporting enhancements into account to minimize system development work not already "in the pipeline." Include specific requirements for IT/IM budget execution. Provide mechanisms for ODs and RAs to oversee and manage their allowances and for lead offices to oversee the	Est. Start: June 2017 Est. End: September 2018	July 2018	OCFO

⁵ Timeline represents the projects life cycle. Within the life cycle the plan is divided into three phases pre-launch, launch, and post launch. The pre-launch phase generally represents steps that involve planning for implementing the recommendation. The launch phase typically represents steps associated with implementing the recommendation. And the post-launch phase typically represents getting feedback on the implementation of the recommendation.

	execution of business line budgets.			
3	Improve and standardize processing and reporting of planned travel obligations to provide information necessary for lead offices to oversee the execution of their business line travel budgets efficiently and effectively. To the extent possible, integrate regional budget execution processes with processes performed by program business-line leads to provide a streamlined approach to travel planning and execution.	Est. Start: July 2017 Est. End: TBD	March 2018	OCFO
4	Define and communicate standard methodologies and analysis tools for FTE burn rate monitoring during budget execution. To the extent possible, integrate regional budget execution processes with processes performed by program business-line leads to provide a streamlined approach to FTE management.	Est. Start: July/August 2017 Est. End: TBD	May/June 2018	OCFO
	Financial – Fee Billing			
5	Implement streamlined and consistent fee billing validation processes, taking upcoming process and system changes into account.	Est. Start: June 2017 Est. End: September 2017	July 2018	OCFO
6	Define the roles and responsibilities for fee billing coordination and validation staff to ensure that they understand and are accountable for fee billing validation work and its implications	Est. Start: June 2017 Est. End: TBD	July 2018	OCFO
7	Define consistent, well-defined processes and reporting to calculate and explain Part 170 full cost estimates	Est. Start: September and February 2018 Est. End: TBD	November/March 2018	OCFO
	Financial Performance Management			
8	Perform a BPI to streamline data collection and reporting processes and clearly define roles and responsibilities for the agency's performance reporting requirements in accordance with the updated MD 6.9 and in collaboration	Est. Start: December 2017 Est. End: TBD	Within 30 days of milestone	OEDO

	with the PIO, OCFO, and business line owners.			
	Administrative Services			
9	Centralize regional security guard support contracts from each regional office to ADM	Actual Start: August 2016 Est. End: September 2016	September 2017	OEDO
10	Centralize the procurement of all commonly used non – information technology office supplies in ADM	Actual Start: August 2016 Est. End: September 2017	February 2017	OEDO
11	Make greater use of agency wide enterprise contracts and agreements and GWAC's for acquisitions of such things as telecommunication services and furniture to provide savings in transactional costs and to reap greater efficiencies, regions should identify contracts that could be moved to one of the following: A. Multi-year contracts B. Agency wide enterprise contracts and agreements C. Government wide acquisition contracts	Actual Start: August 2016 Est. End: October 2016	May – December 2017	OEDO
12	Complete the OEDO Tasking memo to implement the "NRC standards role and responsibilities of the COR" to reduce the number of CORs, the support of the CORs, etc. as recommended by CPSI report.	Actual Start: November 2016 Est. End: September 2017	April 2017	OEDO
13	Standardize and streamline the process and procedures for site access authorization for nuclear facilities across the regional offices to put in place a single more effective and efficient process and procedure.	Est. Start: August 2017 Est. End: TBD	4 th Quarter of 2018	Region I
14	Standardize and streamline drug –testing procedures across the regional offices, taking into account that the agency has determined that only those individuals (employees and contracts) who handle classified information or serve in a position of high public trust are required to hold a clearance or be drug tested.	Est. Start: June 2017 Est. End: TBD	October 2017	Region III
15	Standardize and centralize space management in ADM	Est. Start: April 2017 Est. End: TBD	TBD	ADM

	after the development of an Agency wide standard for HQ office selection. This must be a collaborative effort with the HQ office and NTEU (regional offices will not apply standards at this time).			
	Human Resources			
16	Expand the use of the FPPS to facilitate the electronic approval of personnel actions. (Pilot in Region III and Office of Nuclear Regulatory Research)	Actual Start: January 2017 Est. End: September 2017	November 2018	OEDO
17	Centralize regional external training and onsite training coordination for Regions II and IV in the Office of the Chief Human Capital Officer (OCHCO)	Actual Start: August 2016 Est. End: September 2016	Completed in 2 nd Quarter of 2017	OEDO
18	Centralize regional external training and onsite training coordination for Regions I and III in the Office of the Chief Human Capital Officer (OCHCO)	Actual Start: July 2017 Est. End: September 2017	August – September 2017	OEDO
19	Establish a center of expertise in one of the regional offices to perform routine and other identified functions for all regions and adjust resources required in alignment with workload demands	Est. Start: June 2017 Est. End: TBD	4 th Quarter FY 2018	Region II
20	Perform a review of the BFS staffing plan module and processes to improve the efficiency of this tool for staffing plan tracking and monitoring.	Est. Start: On-going Est. End: TBD	On-going	OCHCO
21	Complete full implementation of electronic processing of personnel actions within FPPS	Est. Start: January 2019 Est. End: TBD	November 2019	OCIO
	IT/IM			
22	Assess the implementation of the enhanced controls over IT practices, new support contracts, data center centralization, and the unified communications project and recommend further centralization or standardization of functions in the PMDA and DRMA organizations by the end of FY 2018.	Est. Start: Active Est. End: September 2018		OCIO
2	Expand and improve	Est. Start: TBD		OCIO

3	communication of records management processes, direct staff to tools and guidance associated with these important functions, and increase awareness of standard roles and responsibilities among all NRC employees to reduce the level of effort required.	Est. End: TBD		
24	Develop a FOIA informational Web site or SharePoint site to act as a repository for policies and procedures and communicate standard roles and responsibilities to all NRC employees to reduce the level of effort required. The site should include the FOIA coordinator's contact information and links to training. In addition, OCIO should communicate the availability of training for all staff.	Actual Start: February 2017 Est. End: May 2017		OCIO
25	Improve communication to increase use of streamlined (self-service) processes (NRC Service Catalog) and services to ensure the centralized purchase of IT equipment and supplies.	Est. Start: TBD Est. End: TBD		OCIO
26	Streamline and enhance Information Technology/Information Management (IT/IM) budget formulation and execution processes to: <ul style="list-style-type: none"> A. Clarify roles and responsibilities B. Enhance integration and alignment with the overall agency budget formulation process C. Provide access to and training for custom spreadsheets and/or tools used in budget formulation and execution D. Implement enhanced reporting to facilitate and streamline budget execution tracking and monitoring. E. Eliminate single-key person dependencies 	Est. Start: TBD Est. End: TBD		OCIO

	Unique Functions			
27	Review and determine if there are any resource efficiencies in the office and region's "unique functions" area to further streamline and standardize how the agency provides support to the mission.	Est. Start: TBD Est. End: TBD		OEDO

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COMMENTS AND SUGGESTIONS

If you wish to provide comments on this report, please email OIG using this [link](#).

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