



OFFICE OF THE INSPECTOR GENERAL

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

Evaluation of NRC's Oversight of the Agency's Federally Funded Research and Development Center Contract

OIG-18-A-17
JULY 11, 2018



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

**OFFICE OF THE
INSPECTOR GENERAL**

July 11, 2018

MEMORANDUM TO: Margaret M. Doane
Executive Director for Operations

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

SUBJECT: EVALUATION OF NRC'S OVERSIGHT OF THE AGENCY'S
FEDERALLY FUNDED RESEARCH AND DEVELOPMENT
CENTER CONTRACT (OIG-18-A-17)

Attached is the Office of the Inspector General's (OIG) evaluation report titled *Evaluation of NRC's Oversight of the Agency's Federally Funded Research and Development Center Contract*.

The report presents the results of the subject evaluation. Following the June 19, 2018, exit conference, agency staff indicated that they had no formal comments for inclusion in this report.

Please provide information on actions taken or planned on 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

OIG-18-A-17
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Results in Brief

Why We Did This Review

In October 1987, NRC contracted with Southwest Research Institute (SwRI) to operate an FFRDC, with the principal focus to provide support for NRC's activities in licensing a deep geologic repository for high level waste (HLW) and spent nuclear fuel (SNF). SwRI established the Center for Nuclear Waste Regulatory Analyses (CNWRA) to serve as an FFRDC. The current contract, awarded on March 30, 2018, is NRC's sixth renewal of the FFRDC contract.

FAR Section 35.017-4 requires, prior to extending a contract for an FFRDC, a sponsoring agency must conduct a comprehensive review of the use and need for the facility.

The evaluation objectives were to determine if NRC is (1) properly considering all FAR requirements for an FFRDC review in preparing its renewal justification, and (2) adequately fulfilling its oversight responsibilities for the FFRDC.

Evaluation of NRC's Oversight of the Agency's Federally Funded Research and Development Center Contract

What We Found

OIG considers all Federally Funded Research and Development Center (FFRDC) renewal Federal Acquisition Regulation (FAR) requirements to be fully satisfied. However, opportunities for improvement were identified in how NRC oversees the administration of the contract. Specifically, oversight in the areas of billing, Contracting Officer Representative (COR) responsibilities, and contract documentation need improvement.

The agency is not adequately fulfilling its oversight responsibilities related to FFRDC contract administration. Specifically, agency management does not

- enforce contractor use of NRC billing instructions,
- provide sufficient training for the FFRDC CORs,
- exercise timely issuance of delegation memorandums, or
- provide timely review and approval of contract modifications.

As a result, the agency is at an increased risk of not being an effective steward of licensee and taxpayer money, because potential billing discrepancies may not be identified and corrected.

What We Recommend

This report makes four recommendations related to improving NRC's oversight of the FFRDC contract through revising procedures and providing training.

Agency management stated their general agreement with the finding and recommendations in this report.

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ABBREVIATIONS AND ACRONYMS

CNWRA	Center for Nuclear Waste Regulatory Analysis
CO	Contracting Officer
COR	Contracting Officer Representative
DCAA	Defense Contract Audit Agency
DOE	Department of Energy
FAR	Federal Acquisition Regulation
FFRDC	Federally Funded Research and Development Center
FY	Fiscal Year
HLW	High Level Waste
IME	Industrial Mobilization Exception
NEAT	NRC Enterprise Acquisition Toolset
NMSS	Office of Nuclear Material Safety and Safeguards
NRC	U.S. Nuclear Regulatory Commission
NWF	Nuclear Waste Fund
OGC	Office of the General Counsel
OIG	Office of the Inspector General
SNF	Spent Nuclear Fuel
SwRI	Southwest Research Institute

I. BACKGROUND

History of NRC's Federally Funded Research and Development Center (FFRDC)

In October 1987, NRC contracted with Southwest Research Institute (SwRI) to operate an FFRDC. The Federal Acquisition Regulation (FAR) Part 2.101 defines an FFRDC as “activities that are sponsored under a broad Charter by a Government agency (or agencies) for the purpose of performing, analyzing, integrating, supporting, and/or managing basic or applied research and/or development, and that receive 70 percent or more of their financial support from the Government; and

- (1) A long-term relationship is contemplated;
- (2) Most or all of the facilities are owned or funded by the Government; and
- (3) The FFRDC has access to Government and supplier data, employees, and facilities beyond that common in a normal contractual relationship.”

SwRI established the Center for Nuclear Waste Regulatory Analyses (CNWRA) to serve as an FFRDC.

Figure 1: Aerial View of SwRI in San Antonio, Texas



Source: OIG

NRC is the sole sponsor of CNWRA. The agency sponsored CNWRA to (1) avoid conflict of interest with regard to NRC's technical assistance and regulatory analysis support program related to the *Nuclear Waste Policy*

Act and NRC's Waste Management Program, and (2) establish long-term continuity in technical assistance and research. The current contract, that was awarded on March 30, 2018, and expires in March 2023, is NRC's sixth renewal of the FFRDC contract.

Since its inception in 1987, the principal focus of CNWRA has been to provide support for NRC's activities in licensing a deep geologic repository for high level waste (HLW) and spent nuclear fuel (SNF). CNWRA supported extensive NRC technical interactions with the Department of Energy (DOE) during the pre-licensing period. This support continued through the licensing review of the DOE application for a repository at Yucca Mountain, which was submitted in June 2008.

The primary support for CNWRA came from NRC's annual appropriations from the Nuclear Waste Fund (NWF), which commenced in Fiscal Year (FY) 1990. The Office of Nuclear Material Safety and Safeguards (NMSS), as the administrative lead for the FFRDC, recognized that continued reliance on the NWF would not be sufficient to maintain CNWRA and considered options by which CNWRA could retain its HLW management expertise.

NRC's Office of the General Counsel (OGC) determined CNWRA could perform fee-based projects for NRC offices under the FAR Industrial Mobilization Exception (IME) to competitive acquisition. Under the IME, non-competitive work may be placed with an FFRDC to establish or maintain essential research, development and engineering capabilities.

In 2014, to facilitate placement of IME work, NRC implemented an enterprise-wide contract authorizing non-Charter work from all offices to be placed non-competitively at CNWRA if the work falls within CNWRA's special competencies as set forth under the Charter contract. Examples of non-Charter work include public meeting assistance, updating technical guidance, environmental assessments, upgrading plant fire safety protection, and developing computer codes. Since 2016, the non-Charter work has exceeded the Charter work.

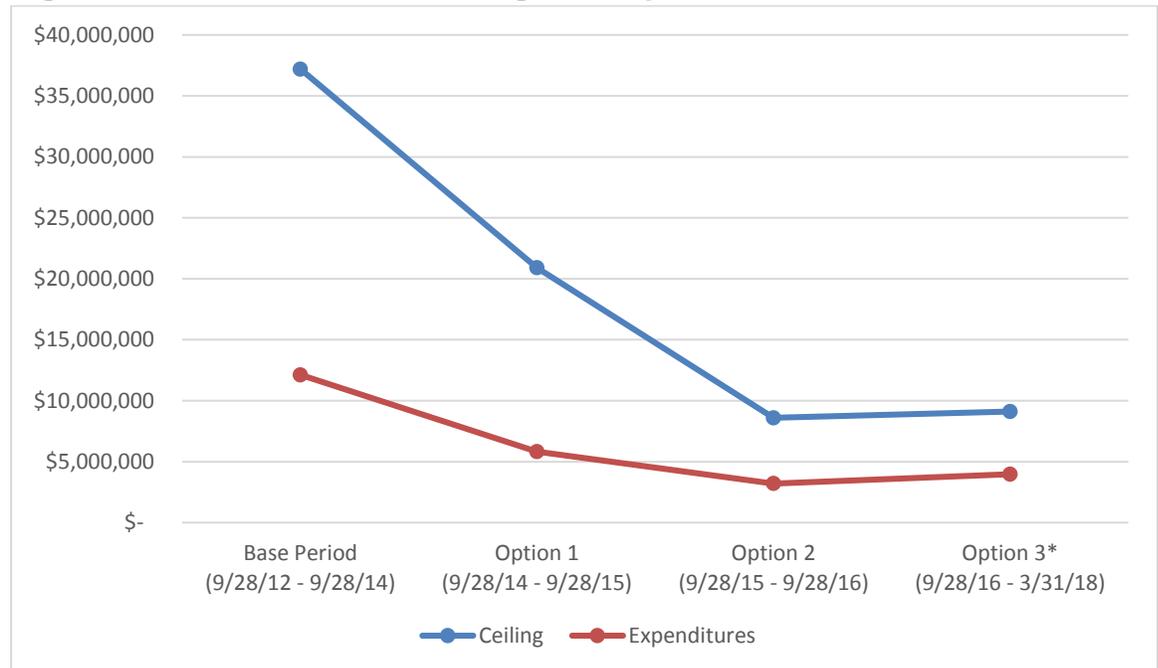
NRC's Prior Contracts with the FFRDC

The prior Charter contract included a 2-year base period, three 1-year option periods, plus a 6-month extension. The period of performance for

the total contract was September 28, 2012, through March 31, 2018. The contract ceiling was \$75,800,000 and the total expenditures were \$25,105,645 (see Figure 2).

The prior non-Charter contract included a 10-month base period, three 1-year option periods, plus a 6-month extension. The period of performance for the total contract was December 5, 2013, through March 31, 2018. The contract ceiling was \$39,925,077 and the total expenditures were \$13,377,659 (see Figure 3).

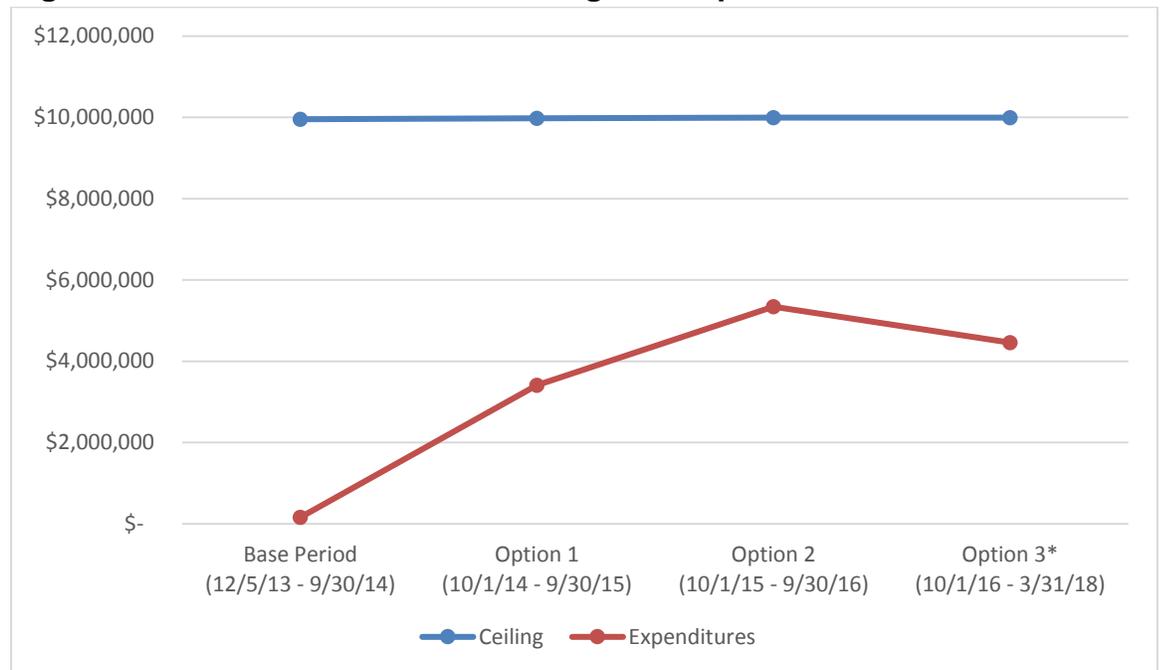
Figure 2: Charter Contract Ceiling and Expenditures



*The period of performance for Option 3 was originally 9/28/16 through 9/28/17. However, the contract was extended for a 6-month period. The amount shown includes the additional expenditures for the 6-month period.

Source: OIG Generated Using Agency Data

Figure 3: Non-Charter Contract Ceiling and Expenditures



* The period of performance for Option 3 was originally 10/1/16 through 9/30/17. However, the contract was extended for a 6-month period. The amount shown includes the additional expenditures for the 6-month period.

Source: OIG Generated Using Agency Data

NRC's Current Contracts with the FFRDC

The current Charter and non-Charter contracts are for one base year plus four 1-year options. The total Charter contract ceiling is \$51,999,812, including approximately \$30,000,000 in NWF, and the total non-Charter contract ceiling is \$4,999,476.

Figure 4: Current Charter Contract and Non-Charter Contract Ceilings

	Base Year 2018 - 2019	Option Period 1 2019 - 2020	Option Period 2 2020 - 2021	Option Period 3 2021 - 2022	Option Period 4 2022 - 2023	Total Contract Ceiling
Charter Contract	\$8,098,087	\$12,364,116	\$12,630,087	\$11,575,269	\$7,332,253	\$51,999,812
Non-Charter Contract	\$1,930,316	\$1,472,680	\$604,489	\$492,461	\$499,530	\$4,999,476

Source: OIG Generated Using Agency Data

FAR Regarding FFRDCs

FAR Section 35.017 sets forth the policy regarding establishment, review, and termination of FFRDCs and related sponsoring agreements. FAR Section 35.017-4 requires that, prior to extending a contract for an FFRDC, a sponsor must conduct a comprehensive review of the use and need for the facility. The review should

1. Examine the continuing need for the FFRDC.
2. Consider alternative sources.
3. Assess the FFRDC's efficiency and effectiveness in meeting agency needs.
4. Assess the FFRDC management in ensuring a cost-effective operation.
5. Determine the criteria for establishing the FFRDC continue to be satisfied and the sponsoring agreement is compliant with FAR.

FAR Section 1.602-2 outlines contracting officer (CO) responsibilities. Among other things, COs are responsible for ensuring all contract requirements have been met, and for designating and authorizing, in writing, and in accordance with agency procedures, a contracting officer's representative (COR) on all contracts and orders that are not firm fixed price. CORs shall be certified, qualified by training and possess experience commensurate with the responsibilities to be delegated.

Finally, CORs must be delegated in writing and maintain their certification for as long as they are assigned to a contract.

Agency Guidance

Management Directive and Handbook 11.1, *NRC Acquisition of Supplies and Services*, dated May 9, 2014, provides NRC staff with guidance regarding contract administration. It also provides roles and responsibilities for COs, CORs, and contract specialists.

Guidance documents from the NRC Enterprise Acquisition Toolset (NEAT)¹ include a document describing general CO and contract specialist roles and responsibilities.

NRC Billing Instructions for Cost-Type Reimbursement Contracts requires contractors to provide specific information on invoices. The instructions also include a sample invoice format. However, a specific format is not required for contractors as long as all elements included in the sample invoice format are addressed on the contractor's invoice.

II. OBJECTIVES

The evaluation objectives were to determine if NRC is (1) properly considering all FAR requirements for an FFRDC review in preparing its renewal justification, and (2) adequately fulfilling its oversight responsibilities for the FFRDC. Appendix A contains information on the audit scope and methodology.

III. FINDING

Although OIG initially identified deficiencies in NRC's documentation of the FAR criteria, the agency added supporting documentation to the FFRDC renewal package that satisfied the requirements. Therefore, OIG

¹ NEAT is NRC's acquisition Web site that displays content based on user roles. When users select a role, NEAT allows them to view acquisition phases, process flows, documents, and reports specific to that role.

considers all FFRDC renewal FAR requirements to be fully satisfied as documented in Appendix B of this report. However, opportunities for improvement were identified in how NRC oversees the administration of the contract. Specifically, oversight in the areas of billing, COR responsibilities, and contract documentation need improvement.

A. Inadequate Contract Administration

Agency contract administration could be strengthened specifically in the areas of billing, COR responsibilities, and contract documentation. NRC policies and Federal regulation provide guidance on contract administration; however, the agency is not adequately fulfilling its oversight responsibilities related to FFRDC contract administration. This happened because agency management does not enforce contractor use of NRC billing instructions and has not provided sufficient training for the FFRDC CORs. Additionally, management has not exercised timely issuance of delegation memorandums, or provided timely review and approval of contract modifications. As a result, the agency is at an increased risk of not being an effective steward of licensee and taxpayer money, as potential billing discrepancies may not be identified and corrected.

What Is Required

Both FAR and NRC policies and procedures provide guidance on contract administration.

Federal Acquisition Regulation Requirements

FAR 1.602-2 states COs are responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, and safeguarding the interests of the United States in its contractual relationships. Additionally, COs designate and authorize, in writing, and in accordance with agency procedures, a COR on all contracts and orders that are not firm fixed price. The designation should specify the following

- the extent of the COR's authority to act on behalf of the CO;

- identify the limitations on the COR's authority;
- specify the period covered by the designation;
- state the authority is not redelegable, and
- state that the COR may be personally liable for unauthorized acts.

NRC Guidance

NRC *Billing Instructions for Cost Reimbursement Type Contracts* requires contractors to submit specific information. The instructions provide a sample format and instructions for preparing and itemizing the invoice. The instructions state that invoices shall be submitted in the format depicted on the attached sample; however, alternate formats are permissible only if they address all requirements of the instructions. Direct labor is required to be itemized and include labor category, hours billed, rate, total, and cumulative hours billed.

MD 11.1, states that in order to perform post award contract activities, CORs must have a formal delegation memorandum issued by the CO and be Federal Acquisition Certification for Contracting Officer Representative certified. Further, CORs should be knowledgeable in post-award contract administration, including monitoring and evaluating contractor performance.

The document titled, *CO and CS Roles and Responsibilities*, located in NEAT, states the CO safeguards the Government's interests by performing the following actions:

- ensuring all necessary contracting actions are performed in a timely manner, and
- overseeing compliance with contract terms and conditions.

What We Found

Contract Administration Could Be Strengthened

NRC could improve its oversight responsibilities related to FFRDC contract administration. Opportunities for improvement were identified in the areas of billing, COR responsibilities, and contract documentation.

Billing

Contractor invoices do not contain sufficient detail and are not prepared in accordance with NRC billing instructions. The instructions require contractors to provide the labor rate charged; however, SwRI invoices did not specify these labor rates. Although not required by the billing instructions at the time,² the contractor also did not identify the CNWRA staff member charging the hours. OIG auditors interviewed NRC CORs assigned to the CNWRA contract who stated they knew which staff working on their task orders charged time on particular invoices only because of their frequent communication with the contractors.

Additionally, all direct labor on reviewed invoices was labeled as "SwRI labor" when the CO stated it was actually "CNWRA labor." The labor rates for SwRI and CNWRA are not identical. However, because SwRI does not provide the labor rate on their invoices, it was impossible for the CORs or CO to determine if SwRI appropriately billed the agency. NRC proceeded to approve the invoices, despite SwRI being incorrectly listed on the invoices.

Further, SwRI billed NRC an overhead rate that was not incorporated into the contract by modification. The rate was 6.06 percent higher than the provisional billing rate shown on the contract modification in effect at the time.

COR Responsibilities

FFRDC CORs interviewed by OIG did not fully understand their administrative responsibilities. For example, one interviewed COR was unsure if the assigned task order was under the Charter or non-Charter contract and was not using the mandatory Office of Administration Inventory Checklist for task orders over \$1M. Moreover, three CORs were not aware that the contractor was not supposed to charge all direct labor under "SwRI labor."

² The agency revised the *NRC Billing Instructions for Cost-Reimbursement Type Contracts* as of March 21, 2018, to include a requirement for contractors to specify staff assigned. The new billing instructions are attached to the Charter and Non-Charter contracts awarded on March 30, 2018.

Contract Modifications

The contract modification to eliminate CNWRA overhead and combine it with SwRI overhead was signed February 26, 2018, although the contractor started charging the higher rate October 1, 2017. The agency stated the modification was retroactive to October 1, 2017, because of a Defense Contract Audit Agency (DCAA) audit report issued on September 29, 2017.³

Why This Occurred

Opportunities for improvement in NRC's administration of this contract exist because of lack of sufficient management attention. Specifically, management has not

- enforced billing instructions
- exercised timely issuance of delegation memorandums which layout COR responsibilities
- implemented specific training for FFRDC CORs, or
- required timely review and approval of contract modifications.

Billing Instructions

NRC does not enforce SwRI's use of NRC billing instructions and the sample invoice format that is attached to each task order. The instructions state the contractor may use a format different than in the sample with the provision that all elements included in the sample invoice format are addressed. The CO was aware SwRI was not providing all elements shown in the sample invoice format, but still did not enforce use of the instructions. Furthermore, not all CORs were aware of the items that need to be included on the invoices.

³ Audit Report No. 3311-2017W19100001, *Independent Audit Report on Southwest Research Institute's Disclosed Accounting Practice Revisions*, dated September 29, 2017.

COR Delegation Memorandums

COR Delegation Memorandums describe the extent of the COR's authority to act on behalf of the contracting officer, as well as any limitations on the COR's authority and the period covered by the designation. OIG requested the memoranda for 32 FFRDC contract CORs and compared the start of the task order period of performance to the date the supervisor signed the delegation memorandum. Results are shown below.

Figure 5: Results of Analysis of Delegation Memorandums

	Number of Instances
No Delegation Memorandum Provided	4
Approved before start of Period of Performance	1
Approved 1 - 30 days after start of Period of Performance	14
Approved 31 - 60 days after start of Period of Performance	3
Approved 61 - 365 days after start of Period of Performance	5
Approved 366+ days after start of Period of Performance	5
Total	32

Source: OIG Generated from Agency Data

If the CORs do not receive their delegation memorandums timely, they cannot be expected to understand the full extent of their duties.

FFRDC COR Training

The agency is not providing COR training specific to the FFRDC contracts. CORs should have a basic understanding of the structure of SwRI and CNWRA, the difference between the Charter and non-Charter contracts, and a clear understanding of their shared responsibilities regarding the invoices and monthly status reports. Further, CORs should be aware of the instructional documents provided to them on NEAT.

Contract Modifications

For 5 months, SwRI billed rates that were not incorporated into the contract by modification because of management inattention. SwRI sent an email to NRC on September 25, 2017, stating its intent to charge and bill the regular overhead rate at the beginning of FY 2018, even though the contract was not modified to incorporate the new rate. The modification was issued 5 months later and it retroactively applied the rates that the SwRI had been using since the beginning of FY 2018.

Why This Is Important

Increased Risk

It is important for the agency, with authority over the spending of licensee and taxpayer funds, to perform a comprehensive review for the need and use of the FFRDC as a sole-source procurement. Inadequate contract administration increases the risk of the agency not being an effective steward of licensee and taxpayer money, as potential billing discrepancies may not be identified and corrected.

Recommendations

OIG recommends that the Executive Director for Operations

1. Develop and implement procedures to use the *COR Invoice Review Checklist* (Cost-Reimbursement Type Contracts/Orders - required for all contracts and orders exceeding \$1M), for all FFRDC invoices to ensure they are prepared in accordance with *NRC Billing Instructions for Cost-Reimbursement Type Contracts*.
2. Revise procedures to require delegation memoranda to be signed by CORs, and approved by their supervisor, before the start of the period covered by the designation.
3. Provide training to FFRDC CORs specific to FFRDC contract administration including, but not limited to, the structure of SwRI and CNWRA, the difference between the Charter and non-Charter contracts,

invoice review, and delegation memoranda.

4. Revise *NRC Billing Instructions for Cost-Reimbursement Type Contracts*, to include language prohibiting the contractor from billing rates that have not been incorporated into the contract by written modification.

IV. AGENCY COMMENTS

An exit conference was held with the agency on June 19, 2018. Prior to this meeting, after reviewing a discussion draft, agency management provided comments that have been incorporated into this report, as appropriate. Agency management stated their general agreement with the finding and recommendations in this report and opted not to provide formal comments for inclusion in this report.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

The evaluation objectives were to determine if NRC is (1) properly considering all FAR requirements for an FFRDC review in preparing its renewal justification, and (2) adequately fulfilling its oversight responsibilities for the FFRDC.

Scope

The evaluation focused on reviewing NRC's oversight of its FFRDC. The evaluation was conducted at NRC headquarters in Rockville, MD, from January 2018 through May 2018. Internal controls related to the evaluation's objective were reviewed and analyzed.

Methodology

OIG reviewed relevant Federal criteria for this evaluation, including:

- Federal Acquisition Regulation (FAR) Part 35-017, *Federally Funded Research and Development Centers*
- Federal Acquisition Regulation (FAR) Part 1-602
- *The Economy Act*, 31 U.S.C. 1535
- The Government Accountability Office's *Standards for Internal Control in the Federal Government*
- The Nuclear Waste Policy Act of 1982

OIG reviewed Management Directive (MD) 11.1, *NRC Acquisition of Supplies and Services*. In addition, OIG analyzed prior FFRDC Charter and non-Charter contract documents, invoices, and task orders. OIG analyzed the current justification for renewal of the FFRDC contract. OIG also reviewed guidance with NEAT ID 603 titled *Contracting Officer Representatives*.

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

OIG conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*.

The evaluation was conducted by Eric Rivera, Team Leader; Terri Cooper, Audit Manager; and Felicia Silver, Senior Auditor.

FAR Requirements Properly Considered

OIG identified deficiencies in documentation of the renewal package. However, the agency agreed and corrected these deficiencies before contract award, therefore, OIG considers all FFRDC renewal FAR requirements fully satisfied. Below is a description of how NRC met the requirements to sole source this contract to SwRI per FAR Section 35.017-4:

1. Continuing Need for the Center

The first FAR criterion requires NRC to examine the special technical needs and mission requirements performed by CNWRA to determine if and at what level they continue to exist. NRC adequately justified its continued need for CNWRA by providing workload projections through 2022, and an assessment of the composition of CNWRA Minimum Charter Program CNWRA staff.

2. Consideration of Alternative Sources

The second criterion requires that NRC consider alternative sources to meet its technical needs. The agency satisfactorily considered alternative sources and provided documentation of their consideration of alternative sources along with an analysis of conducting the work in-house versus at CNWRA.

3. Efficiency and Effectiveness of CNWRA

The third criterion requires that the agency assess CNWRA's efficiency and effectiveness in meeting the agency's needs, including ability to maintain its objectivity, independence, quick response capability, currency in its field of expertise, and familiarity with the agency's needs. The agency adequately addressed the efficiency and effectiveness of CNWRA through documentation of the Center Review Group (CRG) meetings. NRC stated that going forward, CRG meetings will no longer be necessary but they will conduct semi-annual senior management meetings to discuss the contractor's efficiency and effectiveness. Further, they will also complete the annual Contractor Performance Assessment Reporting.

4. Cost-Effective Operations

The fourth criterion requires that the agency assess the adequacy of CNWRA management in ensuring a cost-effective operation. The agency adequately assessed the cost-effectiveness of operations through documentation of the CRG meetings as well. NRC stated that going forward, CRG meetings will no longer be necessary but they will conduct semi-annual senior management meetings to discuss CNWRA management adequacy at ensuring a cost effective operation. Further, they will also complete the annual Contractor Performance Assessment Reporting.

5. Compliance with FAR

The fifth criterion requires that the agency determine that criteria for establishing the Center continue to be satisfied and that the sponsoring agreement (NRC's contract) is in compliance with FAR 35.017-1. The criteria for establishing the Center continue to be satisfied because the agency's mission in the waste management program has not changed. The agency's Charter contract serves as the sponsoring agreement. The contract satisfactorily addressed the requirements for the sponsoring agreement to be in compliance with FAR.

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Office of the Inspector General
Hotline Program
Mail Stop O5-E13
11555 Rockville Pike
Rockville, MD 20852

COMMENTS AND SUGGESTIONS

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