

Office of Inspector General

SEMIANNUAL

REPORT

TO THE

CONGRESS



Covering OCTOBER 1, 1994 - MARCH 31, 1995

Eleventh Semiannual Report

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United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE INSPECTOR GENERAL

Washington, DC 20570-0001

April 28, 1995

Honorable William B. Gould IV, Chairman
National Labor Relations Board
1099 14th Street, NW, Room 11100
Washington, DC 20570

Honorable Frederick L. Feinstein, General Counsel
National Labor Relations Board
1099 14th Street, NW, Room 10100
Washington, DC 20570

Dear Chairman Gould and General Counsel Feinstein:

I am submitting herewith the Semiannual Report (SAR) for the Office of Inspector General (OIG). This SAR is prepared in accordance with Section 5 of the Inspector General Act and covers the period October 1, 1994, through March 31, 1995. I was designated as Acting Inspector General on July 25, 1994 and am serving until a permanent appointment is made.

We issued one audit report during this six-month period and have two audits currently underway that are fully discussed in this report. In addition we have 9 matters under investigation, down from 50 matters pending at this time last year and from 12 matters at the beginning of this semiannual period. These investigations are discussed in the SAR. One of them, the investigation of workers' compensation claims, is discussed fully in the Strategic Plan and presents, I believe, an opportunity for considerable savings.

This will no doubt be my last SAR. I have enjoyed the experience of this assignment and particularly working with the fine staff of the OIG. As this and the last SAR indicates, we have eliminated the investigative backlog described by Mr. Levine in his last SAR. Additionally we have completed the "Quality Control Audit." None of this could have been accomplished without outstanding OIG staff work and without the cooperation of the Board, the General Counsel and their staffs. As I indicated in my last SAR, I am particularly indebted to Director of Administration Gloria Joseph and Associate General Counsel W. Garrett Stack. We have worked closely with them and always received prompt assistance and cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "John E. Higgins, Jr.", written in dark ink.

John E. Higgins, Jr.
Acting Inspector General

FOREWORD

The National Labor Relations Board (Agency or NLRB), which employs about 2,000 employees and, for Fiscal Year 1995, has an annual budget of approximately \$176,000,000, is an independent agency which was established in 1935 to administer the principal labor relations law of the United States - - the National Labor Relations Act (NLRA). The provisions of the NLRA are generally applied to all enterprises engaged in, or to activities affecting, interstate commerce, including health care institutions and the United States Postal Service, but excluding other Governmental entities, railroads and airlines.

The Agency implements national labor policy to protect the public interest by helping to maintain peaceful relations among employers, labor organizations and employees; encouraging collective bargaining; and, by providing a forum for all parties to resolve peacefully representation and unfair labor practice issues. These functions are primarily carried out in two ways: (1) by conducting secret ballot elections to determine if a group of employees wishes to be represented for collective bargaining purposes by a labor organization, and (2) by preventing and/or remedying unfair labor practices committed by employers and unions.

The Chairman, four Board Members and a General Counsel are appointed by the President with the advice and consent of the Senate. The Chairman and Board Members have staggered terms of 5 years each and the General Counsel has a 4-year term.

The Agency, headquartered in Washington, DC, has 33 Regional Offices, some of which have Subregional and/or Resident Offices. This far-flung organization has handled unfair labor practice cases affecting hundreds of thousands of persons and has conducted representation elections in which millions of employees have decided whether they wished to be represented by a labor organization for collective bargaining purposes.

The mission of the Office of Inspector General (OIG) is to promote integrity, efficiency, and effectiveness by conducting audits and investigations in an independent manner and objectively reporting to the Chairman, the General Counsel and the Congress. The OIG Table of Organization provides for an Inspector General; a Supervisory Auditor; three Auditors; a Staff Assistant; and, a Counsel to the Inspector General.

INSPECTOR GENERAL SUMMARY

During the current reporting period, the OIG issued one audit report:

- ◆ "Review of the Quality Control Program Over Casehandling." The OIG determined that the Agency has an effective quality control program from which management can obtain reasonable assurances that casehandling standards are being followed. We believe that the program will be improved by the four recommendations that were made in our report and with which management concurred.

We continued to work on an audit concerning the Agency's performance measurements. We are evaluating:

- ◆ The information system(s) for collecting performance statistics;
- ◆ The methods for translating statistics into performance data; and
- ◆ The Agency's use of the performance data in communicating its caseload and accomplishments.

Our review will also assess the Agency's status relative to implementing the Government Performance and Results Act (GPRA) which requires, beginning with Fiscal Year 1999, that each agency head submit to the President and Congress a report on program performance for the fiscal year just ended. Under the Act, agencies must establish performance goals for programs and identify performance indicators which assess whether measurable goals were achieved. Program funding could be affected by an agency's implementation of the Act.

Thus far we have reviewed:

- ◆ the methods and systems for generating performance data in the Division of Judges, Office of Executive Secretary, Office of Representation Appeals, and the Division of Operations Management;
- ◆ NLRB Annual Reports including procedures for their compilation;
- ◆ procedures used to compile Regional Director monthly statistics;
- ◆ the GPRA, related literature and guidance, and other reporting requirements;
- ◆ the Case Handling Information Processing System (CHIPS);
- ◆ contract deliverables and progress reports relating to the Case Activity Tracking Subcommittee (CATS) initiative; and

- ◆ work products of the Performance Measurement Committee of NLRB's Labor-Management Partnership Council.

Because performance measurement is an important current issue of the Agency, we have decided to set out here three preliminary conclusions. These are not, of course, final audit opinions. These preliminary conclusions are:

(1) The current system is capable of producing Annual Reports, and it has an inventory of reports available which could be useful to management. However, the CATS initiative, through various task group documents and contractor deliverables, has identified needs that exceed CHIPS capabilities. Significant testing of the CHIPS data base was performed. Our testing did not reveal errors occurring with a frequency that would have a material effect on the Agency's Annual Report. It is our opinion that extraordinary efforts are not needed to identify and correct the CHIPS data base. The current process of providing regional offices with error reports for review and correction on a monthly basis is sufficient for assuring accuracy of the data.

(2) Our audit has reviewed the Government Performance and Results Act, OMB Guidance including the Government Performance and Results Act Implementation Plan Draft of August 1993, and the work of the Performance Measurement Committee. It is our view that the Agency is approaching the GPRA and its future requirements in an appropriate manner. The NLRB has coordinated with recognized experts in the field and with employees at all levels. Agency efforts began with defining a common performance measurement language and a framework for developing a strategic plan.

(3) The determination of which performance measures are most meaningful should be based on the Agency's strategic plan which is being developed to meet future reporting requirements. In our view the NLRB Annual Report and budget documents that the Agency currently compiles may already meet many of the "intermediate outcomes" reporting requirements of the GPRA. The NLRB has used performance measurement data to manage its caseload for more than 30 years. Indeed, the Agency may already be ahead of most government agencies in its GPRA reporting capabilities. This, of course, is not to say that the Agency could not add other intermediate outcomes if it desires. Page 4 of the definitions developed by the Performance Measurement Committee (PMC) notes that intermediate outcomes, "Are expected to lead to the ends desired, but are not themselves ends." One area which may need further development to meet the future requirements of the GPRA is "end outcomes." As stated on page 5 of the definitions developed by NLRB's PMC, " the end outcome could be: "The Agency has created a positive environment for the exercise of employee free choice and for the promotion of collective bargaining." By their nature, end outcomes are more difficult to develop and quantify and may evolve to reflect management priorities as the information produced is analyzed and used for strategic planning and stewardship of the Agency.

Areas still requiring audit field work include the Division of Enforcement Litigation and Division of Advice. Our anticipated completion date for this audit is summer 1995. It has been delayed by the resignation of one of the auditors.

We initiated one audit during this reporting period. The General Counsel requested that we determine whether there are any overlapping functions between the Division of Operations-Management and the Division of Administration. Our audit objectives are to: (1) identify functions being performed by both Divisions; (2) ascertain whether either Division is performing tasks which overlap the mission of the other, and (3) assess whether any such overlap is warranted.

During the current reporting period, the Acting Inspector General placed a major emphasis upon joint investigations with other law enforcement agencies and “partnering” with the Agency where it would be mutually beneficial and present no conflict of interest. Among the activities of the OIG were:

- ◆ Six cases previously open were investigated to closure.
- ◆ Three cases were opened and investigated to closure.
- ◆ A joint investigation was conducted with the U.S. Postal Inspection Service.
- ◆ One case was successfully referred to the U.S. Department of Justice for prosecution.
- ◆ Technical assistance was provided to the Agency in their successful conduct of an investigation.
- ◆ Technical assistance was provided to the Federal Mediation and Conciliation Service in their successful conduct of an investigation.
- ◆ A joint review of Federal Employee’s Compensation Act claims continued to be conducted by the Agency and OIG, with technical assistance from the Inspectors General of the U.S. Department of Labor and Tennessee Valley Authority.
- ◆ A joint review of potential misuse of government paid parking spaces continued in a cooperative effort by the OIG and the Agency.
- ◆ Thirty Eight “HOTLINE” calls were received and screened. A large number of these calls related to other OIGs - and initial follow-up was accomplished with the caller and contact referral made with the appropriate Inspector General.

A summary of matters pending in the OIG at the end of the reporting period includes:

- ◆ In conjunction with the Department of Labor Inspector General, the OIG has continued a self initiated extensive review of potential fraudulent Federal Employees Compensation Act claims against the Agency.
- ◆ Two audits are in progress.

- ◆ Nine cases remain open under active investigation by the OIG.
- ◆ One case is pending a decision on criminal prosecution by the Public Integrity Section, Criminal Division, U.S. Department of Justice.
- ◆ One investigation is being pursued with the assistance of the Inspector General of the U.S. Department of Labor.
- ◆ Several Inspector General subpoenas have been issued and served on third parties in conjunction with open investigations.
- ◆ One matter previously referred to the FBI remains under active investigation by that Agency.

SECTION 1

DESCRIPTION OF SIGNIFICANT PROBLEMS, ABUSES AND DEFICIENCIES RELATING TO ADMINISTRATION OF PROGRAMS AND OPERATIONS AND DESCRIPTION OF OIG RECOMMENDATIONS FOR CORRECTIVE ACTION (MANDATED BY SECTION 5 (a) (1) AND (2) OF THE ACT)

AUDITS

"A Review of the Quality Control Program Over Casehandling"

Case No. OIG-AMR-17

For a summary statement regarding the results of this Audit Report, see Section 7, "Summary of Each Significant Audit Report in Section 6, (Mandated by Section 5 (a) (7) of the Act)" at page 9 of this SAR.

INVESTIGATIONS

Included among the investigations completed during this reporting period were the following:

A. Pre-Decisional Disclosure of Adjudicatory Matters Pending Before the Board

An OIG Investigation Disclosed That information regarding pre-decisional matters about pending cases before the Board had been disclosed outside the Board.

Action Taken On September 16, 1994, following the publication of memoranda by both the Chairman and Executive Secretary of the Board regarding the pre-decisional release of adjudicatory materials from Board agendas, the Inspector General directed that an investigation be conducted into such pre-decisional disclosure. During the course of this investigation, the Board Members and senior officials of the Agency were interviewed by the OIG in our effort to determine the source of the disclosures. The investigation did not provide sufficient basis for further proceedings.

B. Submission of False Claims and Statements

An OIG Investigation Disclosed That a Field agent in a Regional Office had submitted false claims supported by false statements on travel vouchers to receive several thousand dollars from the Board and the U. S. Government.

Action Taken On January 17, 1995, the Acting Inspector General was notified by the Agency that irregularities had been found in the travel vouchers submitted by a Field agent in a Regional Office. Shortly thereafter, Counsel to the Inspector General met with senior management of the Regional Office and as a result, identified several hundred dollars of potential false claims submitted by the employee within a single month. With the assistance of the Division of

Administration, we conducted further investigation which included the examination of claims submitted by the employee. On March 1, 1995, the employee acknowledged false claims to OIG investigative staff and, as required, the case has been referred to the Public Integrity Section of the Criminal Division, U. S. Department of Justice. Justice has accepted the case for prosecution of violations of 18 U.S.C. 641 and 1001. A report has been made to the General Counsel for his consideration of appropriate administrative action. Additional investigation by the OIG, with substantial assistance by senior management of the Regional Office, has confirmed additional false claims.

C. Misuse of GSA Vehicle by a Regional Office Field Agent

An OIG Assisted Agency Investigation Disclosed That A Field agent in a Regional Office has utilized a GSA vehicle for personal purposes.

Action Taken On January 9, 1995, the Acting Inspector General was notified by the Agency that it had commenced an investigation into possible misuse of a GSA vehicle by a Regional Office Field agent. On January 13, 1995, after a review of the case, the OIG opened a case file on the matter, but referred formal jurisdiction over the case to the General Counsel, with a promise of technical assistance from the OIG. In January and February 1995, Counsel to the Inspector General met with senior management personnel at the Regional Office, reviewed evidence, and made recommendations for the further conduct and the conclusion of the investigation. As a result of the investigation, the employee was given a 30-day suspension without pay for violation of 18 U.S.C. 1344, and changes were made in the manner in which administration of GSA vehicle use is administered and monitored in the Regional Office.

D. Agency Personnel Allegedly Designated as "Essential" Only for Payroll Purposes

An OIG Investigation Disclosed That Agency employees were allegedly designated as "essential" personnel only for payroll purposes and were not required to report for work during emergencies.

Action Taken On February 14, 1994, an allegation was received at the OIG that various employees in the Agency had been designated as "essential" for purposes of payroll, but were not being required to report during emergency situations. During the course of this investigation, the U.S. Office of Personnel Management issued a new policy designating those required to report to work during emergencies as "emergency employees." A review of the new OPM policy and material provided by the Agency indicated that the clarification provided by OPM resolved any prior confusion about the appropriate policy.

E. Misuse of Official Travel by Regional Office Senior Staff Member

An OIG Investigation Disclosed That . A senior professional staff member of a Regional Office had allegedly engaged in unnecessary travel for personal purposes at a higher than required cost to the Government.

Action Taken . On March 10, 1995, an allegation was received by the OIG that a senior professional staff member from a Regional Office had utilized commercial airline transportation to travel to another city and justified the travel on the basis of work that could have been performed by another Agency employee scheduled for travel, in order to conduct personal business. A review of the employee's travel voucher indicated that the costs associated with the travel were consistent with the letter and intent of Federal Travel Regulations. Investigation into the nature of the travel indicated that the presence of the particular staff member in the destination city was in the best interests of the United States, and had the specific prior approval of the Regional Director.

F. Retribution Against Agency Employee for Cooperation With the Inspector General

An OIG Investigation Disclosed That . An employee of the Agency had alleged that she had been the target of harassment, denied a performance bonus, and placed on leave restriction because of her cooperation with the Inspector General in an investigation.

Action Taken . In July of 1993 an Agency employee alleged to the Inspector General that she had been the target of retribution for having cooperated as a witness in an investigation being conducted by the OIG. The employee concurrently filed an EEO Complaint with the Agency Office of Equal Employment Opportunity on the same grounds. In January of 1994 the employee settled her claim with the Agency Office of EEO and expressed a desire to that office to withdraw her complaint with the OIG. Because the issues in this matter fall within the primary jurisdiction of the OIG, the Inspector General reviewed Agency and OIG practices in coordinating multiple complaints by employees of retaliation for cooperation with the OIG.

G. Hostile Work Environment in Regional Office

Investigation by the OIG Disclosed That . Allegations were made against the senior management staff of a Regional Office that they had created a hostile and inefficient work environment for female employees by engaging in sexual harassment and in a pattern of discriminatory discipline based upon gender and union activity.

Action Taken . In May of 1994 the Inspector General received allegations from an employee of a Regional Office that senior management staff of the office had created a hostile and inefficient work environment by engaging in sexual harassment and in a pattern of discriminatory discipline based upon gender and union activity. Prior to proceeding with the investigation, the complaining witness was advised that an investigation conducted by this office would not duplicate one initiated in another forum such as the EEO process. After initial telephone interviews by the OIG with potential witnesses, and the submission of documents by the complaining witness, it was

determined that the allegations were of a sufficiently serious nature that, while not entirely within the specific primary jurisdiction of the Inspector General, an on-site evaluation at the Regional Office would be required for an adequate inquiry.

An unannounced visit was made to the Regional Office by Counsel to the Inspector General and approximately half of the female staff of the office (including most of the female professionals) were interviewed. A number of the witnesses interviewed had no previous knowledge of the OIG investigation and were selected at random as witnesses. The testimony provided to the OIG indicated that the vast majority of the women interviewed were not aware of any sexual harassment or of any discrimination based upon gender or union activity. Two witnesses did express the view that *any* disciplinary action taken against a woman was evidence of discrimination. While a few employees expressed the view that the management staff utilized an inappropriate amount of government time and resources to disciplinary matters, most commented that the workload of the office was such that they were "far too busy to engage in office politics" or "gossip." Employees who expressed concerns about possible violation of their rights were advised of alternative forums of resolution (EEO, collective bargaining agent, etc.) and in each case the employees acknowledged an awareness of these alternative forums. The OIG investigator interviewed senior management staff and also observed operations of the office on several different days. The investigation did not reveal any evidence of a hostile work environment in the Regional Office and this matter was closed.

H. Use of Government Franked Envelopes for Private Purposes

An OIG-U.S. Postal Inspection Service Investigation Disclosed That . . . A former employee was utilizing government franked envelopes for private mailing.

Action Taken . . . After being notified by Agency officials that a former employee was utilizing (invalid) government franked envelopes for mailing communications to the Agency, an investigation was opened with the assistance of the U.S. Postal Service. A determination was made through investigation that the mailings were at a low volume. The individual was advised that use of government franked envelopes for private mailings was a violation of law. The remaining supply of franked envelopes in the possession of the individual was retrieved by the Postal Inspection Service.

I. Waste Incurred by Agency Shipping Practices

An OIG Inquiry Disclosed That . . . allegations had been made that the Agency utilized express delivery service when standard First Class Postage would have been adequate for shipment of flags to Regional Offices.

Action Taken . . . After receipt of notice from a field employee that the Agency had utilized express delivery service of bulk items instead of First Class Postage, an inquiry was conducted with the Division of Administration. It was determined that the Agency had conducted a cost benefit analysis of potential costs prior to shipment and determined that it was in the best interests of the Government to use an express service in this instance. This cost benefit analysis considered both actual costs of various levels of service as well as available guarantees against loss.

SECTION 2

**IDENTIFICATION OF EACH SIGNIFICANT RECOMMENDATION
DESCRIBED IN PREVIOUS SEMIANNUAL REPORTS
ON WHICH CORRECTIVE ACTION NOT COMPLETED
(MANDATED BY SECTION 5 (a) (3) OF THE ACT)**

None.

SECTION 3

**SUMMARY OF MATTERS REFERRED TO PROSECUTIVE AUTHORITIES AND
RESULTANT PROSECUTIONS AND CONVICTIONS
(MANDATED BY SECTION 5(a)(4) OF THE ACT)**

The following matters were: (1) referred for prosecution during earlier reporting periods and remain pending, (2) referred for prosecution during this reporting period, (3) acted upon by prosecutive authorities during the reporting period with the noted results, and/or (4) had administrative action taken after a declination of prosecution:

In OIG-I-136, we referred a matter to the Public Integrity Section, Criminal Division, U. S. Department of Justice, consistent with the Inspector General's statutory responsibility under Section 4(d) of the Inspector General Act to "expeditiously report to the Attorney General whenever (there are) reasonable grounds to believe there has been a violation of Federal criminal law." This referral, raising potential violations of 18 United States Code Sections 287, 641 and 1001, developed from an investigation opened after information was furnished by the General Counsel of a field agent in a regional office submitting false travel vouchers. This matter remains within the jurisdiction of the Department of Justice.

SECTION 4

SUMMARY OF RESTITUTION MADE OR FINES PAID
AS A RESULT OF CIVIL OR CRIMINAL INVESTIGATIONS
AND/OR AUDITS
(NOT MANDATED BY THE ACT)

Although not mandated by any provision of the Act, this section serves as a statistical summary of all amounts restituted or fines paid to the government as a result of investigations, both criminal and civil, or audits.

AMOUNTS RESTITUTED DURING REPORTING PERIOD

Audit Based Restitutions:

FY 1994: none

Investigation Based Restitutions and/or fines - Civil:

FY 1994: none

Investigation Based Restitutions and/or fines - Criminal:

FY 1994: none

SECTION 5

SUMMARY OF EACH REPORT TO ESTABLISHMENT HEAD
CONCERNING INFORMATION OR ASSISTANCE
UNREASONABLY REFUSED OR NOT PROVIDED
(MANDATED BY SECTION 5 (a) (5) OF THE ACT)

Section 5 (a) (5) of the Act requires the IG to include in a SAR a summary of each report made to the head of the establishment under Section 6 (b) (2) during the reporting period. Section 6 (b) (2), in turn, authorizes an IG to report to the head of the establishment whenever information or assistance requested under subsection (a) (1) or (3) is, in the judgment of an IG, unreasonably refused or not provided. The subsections referred to authorize an IG to have access to, in effect, all documentation or other materials available to the establishment which relate to programs and operations with respect to which the IG has responsibilities under the Act, and authorize an IG to request such information or assistance as may be necessary for carrying out the duties and responsibilities provided by the Act from any Federal, State, or local governmental agency or unit. Finally, Section 5 (d) of the Act provides that an IG shall report immediately to the head of the establishment involved whenever the IG becomes aware of particularly serious or flagrant problems, abuses, or deficiencies relating to the administration of programs and operations of the establishment. The IG's report is then to be transmitted by the head of the establishment to the appropriate committees or subcommittees of Congress within 7 calendar days, together with a report by the head of the establishment containing any appropriate comments.

During the reporting period, no such reports were made to the head of the establishment.

SECTION 6

**LIST OF EACH AUDIT REPORT ISSUED
MANDATED BY SECTION 5(a)(6) OF THE ACT**

Dollar Value (in thousands of \$)

<u>REPORT TITLE AND NUMBER</u>	<u>QUESTIONED COSTS</u>	<u>UNSUPPORTED COSTS</u>	<u>RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE</u>
Review of the Quality Control Program Over Casehandling (OIG-AMR-17)	- 0 -	- 0 -	- 0 -

SECTION 7

SUMMARY OF EACH SIGNIFICANT AUDIT REPORT IN SECTION 6
(MANDATED BY SECTION 5 (a) (7) OF THE ACT)

"REVIEW OF THE QUALITY CONTROL PROGRAM OVER CASEHANDLING"
CASE NO. OIG-AMR-17

This report presents an assessment of the General Counsel's quality control program; a program intended to ensure that Regional Offices handle cases in conformance with established standards. Casehandling begins with the filing of an unfair labor practice charge or a representation petition with one of the Agency's field offices. During Fiscal Year 1993 about 40,000 cases were closed by the Agency's 33 Regional Offices. This audit addressed that aspect of the quality control program which focuses on assuring that individual cases are handled in accordance with prescribed standards. We (1) reviewed the processes for establishing policies and procedures relating to case handling; and (2) evaluated the methods for obtaining reasonable assurance that quality standards were being met. Our audit assessed management controls relating to the annual review of the quality of work performed by the Regional Offices.

In sum, this quality control program provides reasonable assurances that standards are maintained and it (the program) is integrated with the Agency's performance evaluation system. We made four recommendations for change, two of which would modify the methods used in selecting the specific cases to be quality reviewed. The other two recommendations related to the types of cases actually selected for review. Management concurred and is implementing the four recommendations.

SECTION 8

STATISTICAL TABLES SHOWING TOTAL NUMBER OF AUDIT REPORTS
AND TOTAL DOLLAR VALUE OF QUESTIONED AND UNSUPPORTED COSTS
(MANDATED BY SECTION 5 (a) (8) OF THE ACT) ¹

		<u>Dollar Value</u>	
	<u>NUMBER</u>	<u>QUESTIONED COSTS</u>	<u>UNSUPPORTED COSTS</u>
A. Reports for which no management decision had been made by the beginning of the reporting period	- 0 -	- 0 -	- 0 -
B. Reports issued during the reporting period	- 0 -	- 0 -	- 0 -
Subtotal (A + B)	- 0 -	- 0 -	- 0 -
C. For which a management decision was made during the reporting period:			
(i) Disallowed costs	- 0 -	- 0 -	- 0 -
(ii) Costs not disallowed	- 0 -	- 0 -	- 0 -
D. For which no management decision has been made by the end of the reporting period	- 0 -	- 0 -	- 0 -

¹ The several definitions applicable to Sections 8 and 9 of this Semiannual Report may be found in Appendix A.

SECTION 9

STATISTICAL TABLES SHOWING TOTAL NUMBER OF AUDIT REPORTS
AND DOLLAR VALUE OF RECOMMENDATIONS
THAT FUNDS BE PUT TO BETTER USE
(MANDATED BY SECTION 5 (a) (9) OF THE ACT)

	<u>NUMBER</u>	<u>Dollar Value</u> <u>RECOMMENDATIONS THAT</u> <u>FUNDS BE PUT TO BETTER USE</u>
A. Reports for which no management decision had been made by the beginning of the reporting period	- 0 -	- 0 -
B. Reports issued during the reporting period	- 0 -	- 0 -
Subtotal (A + B)	- 0 -	- 0 -
C. For which a management decision was made during the reporting period:		
(i) Recommendations agreed to by management	- 0 -	- 0 -
(ii) Recommendations not agreed to by management	- 0 -	- 0 -
D. For which no management decision has been made by the end of the reporting period	- 0 -	- 0 -

SECTION 10

SUMMARY OF EACH AUDIT REPORT ISSUED
BEFORE REPORTING PERIOD
FOR WHICH NO MANAGEMENT DECISION MADE
BY END OF REPORTING PERIOD
(MANDATED BY SECTION 5 (a) (10) OF THE ACT)

None.

SECTION 11

DESCRIPTION AND EXPLANATION OF REASONS FOR ANY
SIGNIFICANT REVISED MANAGEMENT DECISION
MADE DURING THE REPORTING PERIOD
(MANDATED BY SECTION 5 (a) (11) OF THE ACT)

During the reporting period, no significant revised management decisions were made.

SECTION 12

INFORMATION CONCERNING ANY SIGNIFICANT MANAGEMENT DECISIONS
WITH WHICH INSPECTOR GENERAL IS IN DISAGREEMENT
(MANDATED BY SECTION 5 (a) (12) OF THE ACT)

None.

SECTION 13

REVIEW OF EXISTING AND PROPOSED LEGISLATION AND REGULATIONS
RELATING TO PROGRAMS AND OPERATIONS AND RECOMMENDATIONS
CONCERNING THEIR IMPACT ON ECONOMY AND EFFICIENCY IN THE
ADMINISTRATION OF PROGRAMS AND OPERATIONS ADMINISTERED OR
FINANCED BY DESIGNATED ENTITY OR THE PREVENTION AND
DETECTION OF FRAUD AND ABUSE
(MANDATED BY SECTION 4 (a) (2) OF THE ACT)

Section 4(a) of the Act requires the IG to review existing or proposed legislation and regulations and to make recommendations in the semiannual report concerning their impact on the economy and efficiency of the administration of the Agency's programs and operations and on the prevention and detection of fraud and abuse.

None during this reporting period.

APPENDIX A

DEFINITIONS USED IN SECTIONS 8 AND 9

As used in this SAR, the following phrases have the indicated definitions.

"Questioned cost" is synonymous with the definition of that phrase at Section 5(f)(1) of the Inspector General Act where it is defined to mean a cost that is questioned by the OIG because of: (A) an alleged violation of a provision of a law, regulation, contract, grant, cooperative agreement, or other agreement or document governing the expenditure of funds; (B) a finding that, at the time of the audit, such cost is not supported by adequate documentation; or (C) a finding that the expenditure of funds for the intended purpose is unnecessary or unreasonable.

"Unsupported cost" is synonymous with the definition of that phrase at Section 5(f)(2) of the Inspector General Act where it is defined to mean a cost that is questioned by the OIG because the OIG found, at the time of the audit, such cost is not supported by adequate documentation.

"Management decision" is synonymous with the definition of that phrase at Section 5(f)(5) of the Inspector General Act where it is defined to mean the evaluation by the management of an establishment of the findings and recommendations included in an audit report and the issuance of a final decision by management concerning its response to such findings and recommendations, including actions concluded to be necessary.

"Final action" is synonymous with the definition of that phrase at Section 5(f)(6) of the Inspector General Act where it is defined to mean; (A) the completion of all actions that the management of an establishment has concluded, in its management decision, are necessary with respect to the findings and recommendations included in an audit report; and (B) in the event that the management of an establishment concluded no action is necessary, final action occurs when a management decision has been made.

"Disallowed cost" is synonymous with the definition of that phrase at Section 5(f)(3) of the Inspector General Act where it is defined to mean a questioned cost that management, in a management decision, has sustained or agreed should not be charged to the Government.

"Recommendation that funds be put to better use" is synonymous with the definition of that phrase at Section 5(f)(4) of the Inspector General Act where it is defined to mean a recommendation by the OIG that funds could be used more efficiently if management of an establishment took actions to implement and complete the recommendation, including: (A) reductions in outlays; (B) deobligation of funds from programs or operations; (C) withdrawal of interest subsidy costs on loans or loan guarantees, insurance, or bonds; (D) costs not incurred by implementing recommended improvements related to the operations of the establishment, a contractor or grantee; (E) avoidance of unnecessary expenditures noted in preaward reviews of contract or grant agreements; or (F) any other savings which are specifically identified.

APPENDIX B

**STRATEGIC PLAN
OFFICE OF INSPECTOR GENERAL
NATIONAL LABOR RELATIONS BOARD
FISCAL YEARS 1995 - 1999
(MANDATED BY A GAO REVIEW OF OIGs AT
DESIGNATED ENTITIES - NOV. 1993)**

I. AUDITS

One of the reasons the Inspector General Act was amended in 1988 (Pub. L. 100-504) was to provide an independent audit and investigative capability at 34 Designated Federal Entities including the National Labor Relations Board (NLRB). The mission of this Office of Inspector General (OIG) is to promote integrity, efficiency, and effectiveness at the NLRB by: (1) conducting audits and investigations in an independent manner and (2) objectively reporting to Agency officials and the Congress. We conduct audits that ascertain: the reliability of Agency assertions in its performance and financial reports; whether program goals are being achieved; if operations are conducted economically and in accordance with applicable laws and regulations; and whether resources are being safeguarded. We investigate allegations of fraud and abuse or other misconduct by NLRB employees and individuals who conduct business with the Agency.

The Agency's mission is to administer the principal labor relations law of the United States -- the National Labor Relations Act (NLRA) which is generally applied to all enterprises engaged in interstate commerce, including health care institutions and the United States Postal Service, but excluding other Governmental entities, railroads and airlines. The NLRA is intended to protect the public interest by helping to maintain peaceful relations among employers, labor organizations and employees by encouraging collective bargaining; and, by providing a forum for all parties to peacefully resolve representation and unfair labor practice issues.

RISK ASSESSMENT

During Fiscal Year 1993 remedial actions were taken regarding more than 11,000 cases of unfair labor practices which had been filed with the NLRB. As a result, over 4,000 employees were offered reinstatement. Over \$54 million in backpay and other reimbursements were recovered for more than 21,000 employees. Almost 22,000 charges of unfair labor practices were investigated and determined to lack merit and therefore dismissed by the Agency or withdrawn by the charging party. In Fiscal Year 1993, NLRB certified more than 3,600 elections in which over 223,000 employees were eligible to vote. During the next 5 years NLRB cases will effect actions that directly involve over one million workers and impact labor issues for many more. Our strategic plan is designed to ascertain whether the NLRB is fulfilling its mission in an effective and economical manner. During the next 5 years we will assess: management controls intended to

ensure the quality of casehandling; how well the functional areas are delivering support services to the program offices; and, the propriety of the Agency's process for reporting on its performance.

While formulating this strategic plan, we solicited the views of senior Agency officials, the Congressional committees which have an oversight interest in the NLRB, and OIG staff. In order to develop a strategic plan covering a 5-year period, the OIG identified the critical elements pertaining to program and functional areas at the NLRB. We utilized our audit universe to assess **the program and functional areas and ascertain those matters on which OIG resources will be focused**. Factors considered in determining audit priorities included requirements established by law or regulation, areas that appear susceptible to fraud or waste, dollar magnitude or impact of the activity on the Agency's mission, and the OIG's prior experience.

The NLRB's mission is primarily carried out in two ways: (1) by conducting secret ballot elections to determine if a group of employees wishes to be represented for collective bargaining purposes by a labor organization, and (2) by preventing and/or remedying unfair labor practices committed by employers and unions. Casehandling begins when an unfair labor practice charge or representation petition is filed with one of the NLRB's 52 Regional, Subregional or Resident Offices. In handling unfair labor practice cases, the NLRB is concerned with resolving labor disputes first by settlement and then, if necessary, through judicial proceedings. In order to handle cases and accomplish the NLRB's mission, program offices need support services in functional areas such as financial management, personnel matters, acquisition of goods and services, and information resources.

AUDIT STRATEGIES - PROGRAM AREAS

- ◆ The NLRB compiles statistics on the various stages of case processing and translates this data into performance information. Case processing relates to representation and unfair labor practice matters filed with the Agency. We will evaluate the: (1) information system(s) for collecting performance statistics; (2) process for translating statistics into performance data; and (3) Agency's use of the performance data in communicating its caseload and accomplishments. This evaluation may also provide useful information to the NLRB in relation to the Government Performance and Results Act of 1993. The Act requires, beginning with Fiscal Year 1999, that each agency head submit to the President and Congress a report on program performance for the fiscal year just ended. Under the Act, Federal managers must establish performance goals for agency programs and identify performance indicators which assess whether measurable goals were achieved. Program funding could be affected by an agency's implementation of the Act.

- ◆ Casehandling is the principal means by which the Agency accomplishes its mission. We will determine the effectiveness of management controls intended to ensure quality case work by evaluating the method(s) for: (1) establishing quality standards pertaining to casehandling; and (2) obtaining reasonable assurance that quality standards are being followed.

- ◆ Regional Offices receive unfair labor practice charges, investigate them, determine merit, and settle or prosecute those cases deemed meritorious. In some instances employees are awarded backpay or other reimbursements. During Fiscal Year 1993 over \$54 million in reimbursements to employees discriminated against in violation of their organizational rights was obtained by the NLRB from employers and unions. We will evaluate the controls over the computation and disposition of reimbursements.
- ◆ In some backpay cases, lump sum payments are remitted by employers or unions to NLRB's Finance Branch which handles distribution of the monies including tax calculations. If discriminatees cannot be located those monies are also remitted to the Finance Branch. We will evaluate the controls over the receipt, maintenance and disposition of those monies.
- ◆ Cases generally reach the headquarters Five-Member Board when parties contest decisions made by an NLRB Regional Director or an administrative law judge (ALJ). Cases involve either allegations of unfair labor practices by employers or unions; or disagreements about elections to determine whether employees wish to be represented by a union. The OIG will follow-up a review by GAO which reported that action was needed to improve case processing time at Headquarters.
- ◆ The NLRB is considering establishing time standards for ALJs to adjudicate cases. The Agency's Division of Judges may also take a more active role in conducting settlement negotiations with the parties to facilitate the expeditious resolution of unfair labor practice proceedings. We will assess the impact of these actions and whether the intended results are being achieved.

AUDIT STRATEGIES - FUNCTIONAL AREAS

- ◆ Assess the Agency's financial management function and ascertain whether it delivers accurate and timely data and if it provides stewardship over NLRB resources. Thus, we will determine if:
 - financial reports and statements were consistent and meaningful;
 - transactions were in conformance with appropriation law and processed in accordance with accounting principles;
 - there is accountability over property; and
 - internal controls are effective.

- ◆ Evaluate the effectiveness of NLRB's budgeting process. In doing so we will review budget:
 - planning;
 - formulation;
 - justification; and
 - allocation.

- ◆ Assess personnel practices for establishing employee responsibilities and appraising individual performances. Our review will also address:
 - performance measures;
 - awards; and
 - training.

- ◆ Evaluate whether controls over time and attendance practices are effective and are being implemented as intended. (Note: Time and attendance procedures are the primary controls over payroll costs which historically has represented about 77 percent of the expenses incurred by the NLRB.)

- ◆ Assess whether the acquisition function is meeting the Agency's needs in an effective and efficient manner. Separate evaluations will be conducted for goods versus services to assure that:
 - needs are clearly identified;
 - actions conform with laws and regulations;
 - purchases are competitively priced;
 - there is timely delivery and the acquired items were acceptable to user; and
 - there is property control.

- ◆ Determine if the NLRB's information resources function optimizes Agency effectiveness by providing employees with the tools needed to accomplish their duties. In doing so we will examine:
 - long range planning;
 - use of technology including research capabilities;
 - computer security; and
 - customer support.

OIG AUDIT RESOURCES

This Strategic Plan sets forth 13 audits which we believe substantially address areas in which the Agency must be effective if the NLRB is to accomplish its mission. We estimate 20 staff years will be needed to conduct the 13 audits over the 5-year period (4 FTE per year). A standard staff

year consists of about 1600 direct hours. We plan to expend about 50 percent of our direct audit resources on the program areas and 50 percent on the functional areas.

The OIG staff includes one supervisory and three staff auditors. Completion of this Strategic Plan within 5 years will necessitate that the audit staff devote all of its efforts to the 13 reviews previously identified. It is highly probable that, during the next 5 years, audit resources will be needed for projects other than the 13 reviews discussed in this Strategic Plan. In Fiscal Year 1995 the NLRB was appropriated about \$176 million including funding for a Full-Time Equivalent Employment (FTEE) of 2054. The NLRB's FTEE will be reduced to 1883 FTEE by the end of Fiscal Year 1999. Under these circumstances the Agency may not be able to allocate any additional positions to the OIG. Without additional personnel our Strategic Plan will require more than 5 years to complete. If successfully implemented this plan will: provide audit coverage to many of the most critical program and functional areas within the Agency; and, enable the OIG to assess many of the factors which could impede mission accomplishment by the NLRB.

PERFORMANCE MEASURES

- ◆ accomplishment of the OIG's Annual Audit Plan which identifies those reviews which are to be conducted each fiscal year
- ◆ results of the quality review -- performed every 3 years by an external entity -- which assesses the OIG's conformance with generally accepted government auditing standards
- ◆ audit recommendations accepted by the Agency and management's comments which are included in their entirety in each OIG report
- ◆ management's comments regarding the OIG's semiannual reports
- ◆ requests from management for services

II. INVESTIGATIONS

RESOURCE ANALYSIS

The investigative responsibility in the Office of Inspector General is assigned to the Inspector General and to the Counsel to the Inspector General.

RISK ANALYSIS

The NLRB has about 56 offices throughout the country and these offices and their staffs operate with a high degree of independence and autonomy from Washington. While the Agency itself is exceptionally well managed, this dispersion and independence of staff creates a somewhat greater potential for risk than what might be generally expected in a less dispersed organization.

ENVIRONMENTAL ANALYSIS

The Office of Inspector General at the NLRB has a high level of credibility and a reputation for independence. It is anticipated that this will continue, and that more staff and members of the public will continue to bring to the attention of the OIG areas of suspected improper activity. This is the re-active portion of the mission challenge. Other areas for potential investigation are less adaptive to being initiated by "hotline" or similar conduits and require pro-active efforts by the Inspector General and the proactive application of investigative and legal resources. One pro-active method is to increase the visibility of the OIG. This heightened visibility will increase the effectiveness of OIG operations in an environment of limited resources by providing added deterrence to improper activities and by encouraging increased cooperation

Recognizing that the staffing is not likely to increase, it is incumbent upon the OIG to utilize its existing investigative assets in a manner that will have the greatest impact possible upon accomplishment of workload and in assuring that the overall goals - prevention and detection of fraud, waste and abuse and increasing the economy and efficiency of the Agency - are attained within available resources. To paraphrase the National Performance Review - to do more and better - with less - and do it more quickly and in a "smarter" manner.

OBJECTIVES

The objectives identified to guide the investigative and legal functions over the long term are:

- Provide timely responses to complaints brought to the OIG.
- Increase proactive identification of potential areas of abuse to assure early and effective interdiction.

- Utilize available resources from other agencies either with concurrent jurisdiction or under "investigative assistance projects" such as envisioned by the Executive Committee on Integrity and Efficiency.
- Adopt enhanced investigative models to allow for expedited handling of investigations, while increasing quality outputs consistent with Department of Justice and Merit System Protection Board standards for referral *where appropriate*.
- Place emphasis on conducting those investigations which will produce the greatest impact upon the effectiveness of Agency operations while continuing to develop quality criminal cases and administrative cases.
- Enhance relationships with Agency officials to assure a cooperative effort wherever possible, and to provide accelerated release of investigations to allow the Agency to pursue appropriate administrative actions on a timely basis.
- Maintain a high level of technical training and proficiency for staff to assure maximization of limited human resources.
- Develop a high level of exposure within the Agency, the labor relations and Inspector General communities to assure a strong cooperative working environment with our "customers," both to develop confidence in the Inspector General's ability to recognize and respond to problems, and to assure a positive environment to implement recommendations.
- Protection of Whistleblowers and cooperating witnesses.

IMPLEMENTATION

Implementation of this Plan has already begun. The Acting Inspector General required a thorough analysis of current assets and OIG obligations. To better coordinate the investigative and legal efforts, the open investigative caseload was assigned to Counsel to the Inspector General.

All open (and some closed) cases were analyzed to provide a substantial base to identify both potential challenges and means of enhancing available assets. A review was conducted of each open case to determine additional work required to complete, what cases could be "moved" in a manner similar to that of litigation - multiple cases in "flow" on a simultaneous basis, rather than categorized primarily by priority. It was quickly determined that a substantial number of cases remained open owing to a need to enhance communication with Agency cooperating personnel. Enhanced communications were developed both with the Chairman, the General Counsel and with the Designated Agency Ethics Official.

As a direct result of the case review and the enhanced communications, the OIG was able to update quickly a number of files that were open because they awaited input from the Agency. An

additional number of cases were reviewed and it was determined that the allegations made, even if proven, were either not within the purview of the Inspector General or were so de minimis as not to warrant expenditure of assets. This further reduced the existing caseload.

The Agency and staff continue to be the source of information to open new investigations and provide cooperation in successfully completing other investigations. On cases referred to the OIG by the Agency for possible criminal action, thorough review by the OIG and the Department of Justice were accomplished with a one week turn-around, thus enabling the Agency to move forward expeditiously where, in the absence of DOJ action, there is a critical need for administrative action.

Counsel to the Inspector General has remained active in the Council of Counsels to Inspectors General, the activities of the Assistant Inspector Generals for Investigation. To enhance presence and visibility in the labor community and government generally, counsel is active in labor and government sections of both the American Bar Association and the Federal Bar Association. In the government sector, participation is with the American Society for Public Administration and the Liaison Officers Association. Counsel also participates in the Association of Certified Fraud Examiners and the Federal Investigators Association.

Consistent with the National Performance Review and this plan, the OIG provided technical assistance on Agency conducted investigation, and is working jointly on the review of another area with the Agency, developed from an OIG investigation. A joint investigation was conducted with the Postal Inspection Service in one case.

In analyzing potential risk areas, the Acting Inspector General identified the Federal Worker's Compensation Act Program (with an Agency chargeback of \$500,000 per fiscal year) as a potentially high risk area. Consistent with the strategic plan, a joint operating relationship has been developed with the OIG of the Department of Labor, and an Investigative Assistance Project has been developed with the award winning FECA Fraud Program of Inspector General George Prosser of the Tennessee Valley Authority. More importantly, all current claims against the Agency are being reviewed and cases selected for further followup where the review indicates that investigation is warranted. We believe that the potential here for savings will be extensive.

The Acting Inspector General has placed emphasis upon staff training opportunities beyond those previously available, and focused upon actual increases in economy and efficiency as the result of investigations.

Perhaps most importantly, the investigative backlog present at the beginning of this planning activity has been reduced from 50 to 9 actively worked cases, with no loss in investigative quality. An enhanced investigative model has been employed so that the 9 investigations open are all operating in a "flow" towards completion and any new investigations can be initiated immediately.

PRELIMINARY RESULTS

Thus, this Strategic Plan has been developed and implemented with a positive impact upon both the OIG and the Agency as of the close of the last reporting period. It is, however, an evolving tool.

OIG INVESTIGATIVE RESOURCES

The NLRB OIG has one full time counsel who is responsible for investigations. It is anticipated that at our current caseload, this position will assure the necessary investigative services.

PERFORMANCE MEASURES

- Assessments of referral agencies, e.g., DOJ
- Management's comments regarding semiannual reports
- Requests from management for services
- Quantity of Joint Investigations

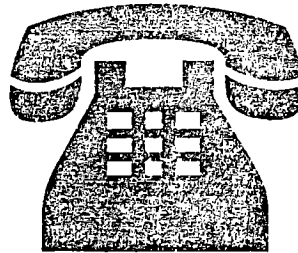
HELP ELIMINATE

WASTE

FRAUD

ABUSE

AT THE NATIONAL LABOR RELATIONS BOARD



PLEASE NOTIFY THE OFFICE OF INSPECTOR GENERAL (OIG) IF YOU ARE AWARE OF OR SUSPECT ANY SUCH ACTIVITY. YOU MAY CONTACT THE OIG IN ONE OF SEVERAL WAYS: (1) IN WRITING OR IN PERSON - OFFICE OF INSPECTOR GENERAL, 1099 14th Street, NW, ROOM 9820, WASHINGTON, DC 20570; (2) BY TELEPHONE - DURING NORMAL BUSINESS HOURS, CALL (202) 273 1960; 24 HOURS A DAY, USE THE NATIONAL TOLL FREE HOTLINE AT 1 800 736 2983 (SEE IG MEMORANDUM DATED MAY 15, 1992). THE HOTLINE IS A SECURE LINE AND CAN ONLY BE ACCESSED BY THE OIG STAFF FROM INSIDE THE OIG OFFICE. THE DEVICE WHICH WOULD PERMIT ANYONE, INCLUDING THE OIG STAFF, TO ACCESS THE HOTLINE FROM OUTSIDE THE OIG HAS BEEN DEACTIVATED SO IT CAN ONLY BE ACCESSED BY MEMBERS OF THE OIG STAFF FROM INSIDE THE OFFICE.

REMEMBER - THE OIG HOTLINE IS OPEN 24 HOURS A DAY, 7 DAYS A WEEK.

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