

Office of Inspector General

Semiannual Report
to Congress



For the Period
April 1, 1993 - September 30, 1993
Eighth Semiannual Report



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE INSPECTOR GENERAL

Washington, DC 20570-0001

October 29, 1993

Honorable James M. Stephens, Chairman
National Labor Relations Board
1099 14th Street, NW
Room 11100
Washington, DC 20570

Honorable Jerry M. Hunter, General Counsel
National Labor Relations Board
1099 14th Street, NW
Room 10108
Washington, DC 20570

Dear Chairman Stephens and General Counsel Hunter:

I am pleased to provide each of you with two copies of the Semiannual Report on the activities of the Office of Inspector General (OIG) for the period April 1 through September 30, 1993. This is the eighth Semiannual Report to issue since the creation of the OIG.

During this reporting period, we issued one Audit Report, "A Review of the National Labor Relations Board's Controls Over Capitalized Property." The audits that are currently underway are: (1) "A Review of the Agency's Program for Responding to Allegations it Receives Which Could Result In Criminal Or Administrative Action Against Agency Employees," and (2) "A Review of the Agency's Budget Formulation Process."

In addition, we have continued to investigate those matters which are brought to our attention, as well as those which are self-initiated. Unfortunately, the lack of adequate staffing, coupled with case filings over which we have little, if any, control, has caused the backlog of investigations to more than quintuple between Fiscal Year 1990 and the end of Fiscal Year 1993. This has had the result of some investigations not being started, with others being commenced, only to be stopped when a matter which we deem to have a higher priority arises.

I have remained active in the Executive Council on Integrity and Efficiency (ECIE), created by Presidential Executive Order. In addition, I have continued to chair the monthly meetings of the Law Enforcement Committee of the ECIE which explores issues law enforcement agencies, such as ours, have in common; and, as such, chaired the third annual conference of ECIE Inspectors General, held June 2 through 4, 1993.

Chairman Stephens/General Counsel Hunter

October 29, 1993

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During this reporting period, the peer review of the OIG was completed by the Inspectors General of the Pension Benefit Guaranty Corporation and the United States International Trade Commission. I have sent you copies of those peer review results under separate cover.

This will also serve as a reminder that, pursuant to Section 5 (b) of the Inspector General Act of 1978, as amended, this report "shall be transmitted by (the head of the establishment) to the appropriate committees or subcommittees of the Congress within thirty days after receipt of the report, together with a report by the head of the establishment "

With your continuing cooperation, my staff and I look forward to contributing, in whatever way we can, to the integrity, efficiency and effectiveness of the Agency's operations and programs.

Sincerely,

A handwritten signature in cursive script that reads "Bernard Levine".

Bernard Levine
Inspector General

SEMIANNUAL REPORT
OF THE
OFFICE OF INSPECTOR GENERAL
NATIONAL LABOR RELATIONS BOARD
FOR THE PERIOD
APRIL 1, 1993 THROUGH SEPTEMBER 30, 1993



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FOREWORD

This Semiannual Report is the eighth issued by the Office of Inspector General (OIG) since the appointment of the Inspector General (IG).¹

The National Labor Relations Board (Agency or NLRB), which employs about 2,100 employees and, for Fiscal Year 1993, had an annual budget of approximately \$170,000,000, 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). Upon the filing of a petition in a representation matter or an unfair labor practice charge, 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 peacefully resolve representation and unfair labor practice issues. This function 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.

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, 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.

Prior to the creation of the OIG under the Inspector General Act of 1978, as amended (the Act), the Agency had a Security and Audit Branch under the Division of Administration. The audit function of that Branch is now contained within the OIG. The OIG Table of Organization provides for an IG; a Supervisory Auditor; three Auditors; a Staff Assistant; and, a Counsel to the IG who also assists the IG in conducting investigations.

¹ The initial Semiannual Report issued prior to the appointment of the IG.

During this reporting period, the OIG continued to perform priority audits contained in its audit universe, and has continued to investigate those complaints which have been brought to its attention, as well as those matters which have been self-initiated.

INSPECTOR GENERAL SUMMARY

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

- ◆ "A Review of the National Labor Relations Board's Controls Over Capitalized Property."

Included among the audit findings were:

- ◆ the Agency did not properly monitor a contractor's deliveries of ADP goods and services costing over \$3 million. At the time of each delivery, the NLRB was not provided, and did not compile, a record which set forth the goods and services received and accepted by the Agency. As a result, no check was made at the time of delivery as to what was actually received. The NLRB made payments based on the vendor's invoices which billed the Agency for amounts due, but did not list or describe equipment, software, services, and other items provided by the contractor;
- ◆ assets acquired through capital leases were inappropriately treated as annual operating expenses;
- ◆ peripheral equipment and materials which augmented the operation of other equipment were erroneously excluded from the value of assets;
- ◆ computers and software purchased in large quantities were considered an expense in the year acquired; and,
- ◆ acquisitions and disposals of capitalized property were not posted to the inventory record in a timely manner and inadequate procedures were utilized in conducting the physical inventories of capitalized property and other computer equipment at the Regional Offices.

We continued to work on two other audits during this reporting period, one concerning the budget formulation process, and the other the Agency's program for responding to allegations it receives which could result in criminal or administrative action against Agency employees.

In addition, during the current reporting period, the OIG:

- ◆ completed 1 investigation which was referred to a United States Attorney for prosecutive consideration;
- ◆ referred 1 matter to the United States Postal Service, Chief Postal Inspector/Inspector General for investigation;
- ◆ initiated 18 investigations (16 involving non-programmatic matters and 2 concerning programmatic matters - the latter 2 being referred to the General Counsel); 14 of the former

remain pending in the OIG in the investigative stage (the OIG has a total investigative backlog, as of the end of the reporting period, of 49 cases);

- ◆ closed 7 investigative matters following the completion of administrative action;
- ◆ completed 9 investigations which were referred to the Chairman and/or General Counsel for administrative action, 5 of which are still pending before them;
- ◆ as noted earlier, referred 2 matters to the General Counsel which were purely programmatic in nature;
- ◆ maintained in a pending status the 1 matter referred to the General Counsel's Office of Equal Employment Opportunity during the October 1, 1989 through March 31, 1990 reporting period;
- ◆ maintained in a pending status 18 of the recommendations and/or suggestions made during the reporting period April 1, 1992 through September 30, 1992; and,
- ◆ maintained in a pending status 34 of the recommendations and/or suggestions made during the reporting period April 1, 1993 through September 30, 1993.

A summary of the matters pending in the OIG at the end of the reporting period is as follows:

- ◆ 49 investigations in progress;²
- ◆ 2 audits in progress;
- ◆ 2 matters pending before United States Attorneys from earlier reporting periods;
- ◆ 1 matter pending before the Office of Special Counsel for action;
- ◆ 1 matter referred to the United States Postal Service, Chief Postal Inspector/Inspector General for investigation;
- ◆ 1 matter referred to the General Counsel's Office of Equal Employment Opportunity;
- ◆ 12 matters pending administrative action (all but 1 of which were referred to the General Counsel), of which:
 - ◆ 5 were referred during this reporting period;

² The chart on page vii depicts the backlog of investigations in the OIG.

- ◆ 3 were referred during the October 1, 1992 - March 31, 1993 reporting period;
 - ◆ 3 were referred during the April 1, 1992 - September 30, 1992 reporting period;
- and,
- ◆ 1 was referred during the October 1, 1991 - March 31, 1992 reporting period.

**AMONG THE 11 PENDING BEFORE THE GENERAL COUNSEL
ARE THE FOLLOWING:**

DATE OF INVESTIGATIVE REPORT	SUBJECT MATTER
7/7/92	ALLEGED DRUG USE
8/21/92	ALLEGED IMPROPER PERSONNEL ACTION
1/28/93	ALLEGED MISUSE OF DINERS CLUB CARDS
3/10/93	ALLEGED TRAVEL VOUCHER IRREGULARITIES
6/8/93	ALLEGED IMPROPER PERSONNEL ACTION
9/23/93	ALLEGED BRIBERY AND OTHER MISCONDUCT

Also pending in the OIG at the end of the reporting period were:

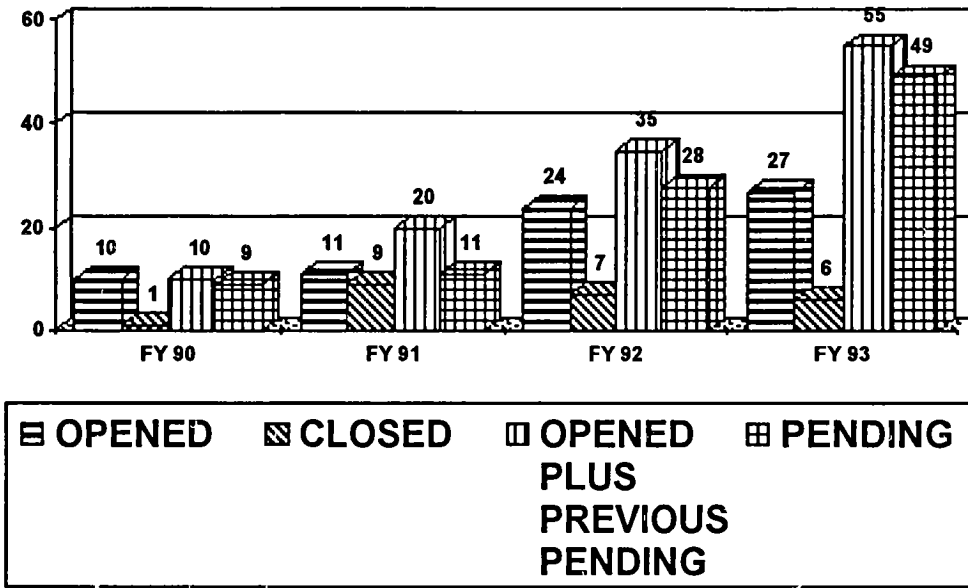
◆ 21 non-audit recommendations and/or suggestions pending action by the Chairman and/or General Counsel, 11 of which were made during the reporting period and 10 of which were made during prior reporting periods.

**AMONG THOSE 21 NON-AUDIT RECOMMENDATIONS
AND/OR SUGGESTIONS ARE THE FOLLOWING:**

DATE OF RECOMMENDATION OR SUGGESTION	MADE TO WHOM: CHAIRMAN (C) GENERAL COUNSEL (G) OR BOTH (B)	SUBJECT MATTER OF RECOMMENDATION OR SUGGESTION
12/15/92	B	AGENCY RULES BE AMENDED TO MAKE COUNSEL TO IG FOIA OFFICER FOR OIG
2/5/93	B	SOLICITATION OF OIG VIEWS
6/16/93	B	OBLIGATION TO REPORT MATTERS OF INTEREST TO OIG
8/4/93	B	SECURITY OF HOTLINE
8/25/93	G	CONSULTATION WITH OIG PRIOR TO COMMENCING INVESTIGATIONS
9/30/93	G	APPOINTMENT OF DEPUTY GC DURING LAST 3 MONTHS POTENTIALLY CONSTITUTING WASTE

INSPECTOR GENERAL INVESTIGATIVE BACKLOG ³

**OFFICE OF INSPECTOR GENERAL INVESTIGATIVE BACKLOG
EXCLUSIVE OF PURELY PROGRAMMATIC REFERRALS TO THE GENERAL COUNSEL
By Fiscal Year
From November 7, 1989 through September 30, 1993**



³ Of the 49 cases in the backlog, 1 is pending before a United States Attorney, 1 is pending before the Office of Special Counsel, 1 before the Agency's Office of Equal Employment Opportunity, 11 before the General Counsel with recommendations for administrative action and 1 before the Chairman and General Counsel awaiting administrative action. The remaining 34 are awaiting the completion of investigation or action by the OIG following the taking of administrative action by the General Counsel.

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 National Labor Relations Board's Controls Over Capitalized Property," Case No. OIG-F-5

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 16 of this Semiannual Report.

INVESTIGATIONS

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

A. Contents of Regional Office Investigative File Allegedly Disclosed to the Charged Party

An OIG Investigation Disclosed That . . . A Regional Office employee allegedly, for pay, disclosed the contents of an investigative file to a relative who was employed by the Charged Party. On September 9, 1993, consistent with the IG's statutory responsibility under Section 4(d) of the IG Act to "expeditiously report to the Attorney General whenever [there are] reasonable grounds to believe there has been a violation of Federal criminal law," the investigative results were referred to a United States Attorney.

Action Taken . . . The United States Attorney declined prosecution. The matter was then referred to the General Counsel for any administrative action deemed appropriate. The OIG has not yet been apprised of any such action.

B. Equal Employment Opportunity Complaints Lodged Against the Office of the General Counsel

An OIG Investigation Disclosed That . . . Pressure was allegedly brought to bear on Regional Directors by managerial employees in the General Counsel's Division of Operations-Management (DOM) to hire Blacks for the professional positions which they were authorized to fill during Fiscal Year 1991 even though some of the Directors in question had what they considered to be suitable applicants who were either members of other minority groups or White males or females. During the course of the investigation, related allegations were raised concerning: (1) the desire of

a Regional Director to terminate a minority employee, but who was told that such a recommendation would not be approved in the DOM; and, (2) another Regional Director who recommended a White male for a supervisory position, but who then found that recommendation thwarted when the DOM appeared to favor a Black female for the position.

The investigation disclosed that such conduct would contravene the Agency's own Multi-Year Affirmative Employment Program Plan, FY 1988 through FY 1992 (MAEPP) which was the only written Agency policy extant at the time of the Fiscal Year 1991 hiring. The MAEPP designated Asian Males as the only group for which there was a "manifest imbalance" and designated Asian Females and American Indians as the only groups for which there was a "conspicuous absence" in the field offices for, among others, professional employees. The MAEPP was notably silent about a "manifest imbalance" or "conspicuous absence" for Blacks and did not target them for recruitment for nonsupervisory Field Attorney and Field Examiner positions. The only group noted for an increase in entry-level field professional positions was Asians. No reference was made to American Indians for whom there was a noted "conspicuous absence."

A statistical analysis of: (1) the percent of each group in the applicant pool; (2) what percent of each group was referred by the DOM to Regional Offices out of the total number of referrals; and, (3) what percent of each group was authorized to be hired by the DOM out of the total number of professionals hired in Regional offices during the critical period in 1991, disclosed the following result:

EEO GROUP	PERCENT OF APPLICANT POOL REPRESENTED BY GROUP	PERCENT OF ALL REFERRALS TO REGIONAL OFFICES REPRESENTED BY GROUP	PERCENT OF ALL HIRES IN REGIONAL OFFICES REPRESENTED BY GROUP
AMERICAN INDIANS ⁴	.36 % ⁵	0 %	0 %
ASIANS	.89 %	4.44 %	1.82 %
BLACKS	13.47 %	55.55 %	25.46 %
WHITES	55.83 %	33.33 %	65.45 %

Action Taken. .A Final Investigative Report was submitted to the General Counsel on June 28, 1993 with the following conclusions noted:

⁴ This is the name given to the group in the MAEPP.

⁵ As not all groups for which the Agency had data are represented in the chart, the totals for each column do not add up to 100%.

a. There was a lack of attention to the Agency's MAEPP when recruiting was undertaken for Fiscal Year 1991;

b. There was an absence of clear and definitive direction for what the Agency's recruiting and hiring policies were;

c. Absent a clear and definitive statement of that policy, prior to the commencement of the investigation, the vacuum was filled by some managerial employees who were understandably eager to do what they perceived was their superior's desires; and,

d. All of the above resulted in:

i. A Regional Director, who had an Asian applicant (a group for which there was a recruiting need), being told that the Asian applicant, whose application had not even been reviewed in Washington, was someone to consider for next year as the emphasis this year was on recruiting and employing Blacks;

ii. Additional hirings beyond what the situation warranted were authorized as a means of offering positions to Blacks;

iii. Another supervisory position was authorized for posting in order to secure that position for a Black, even though the Regional office complement did not warrant such a posting;

iv. In the case of one Regional Office, a Regional Director was reminded to take certain recruiting efforts which would have resulted in more Blacks and Hispanics being recruited, but the Director received no encouragement to recruit Asians or American Indians, the only two groups for whom there was a "manifest imbalance" or "conspicuous absence;"

v. Pressure was being exerted to hire at least one Black who was considered not to have the appropriate credentials;

vi. One Regional director was informed that a recommendation to terminate a Black employee who had been exhibiting poor performance would not be looked upon favorably in the DOM; and,

vii. Hiring actions taking place in Fiscal Year 1991 were at odds with the Agency's own declaration as to which groups had a "manifest imbalance" or "conspicuous absence" in the employee complement:

The General Counsel, in agreement with the recommendations made, informed the OIG that:

1. The Executive Assistant to the Associate General Counsel, Division of Operations-Management, will make regular presentations to remind the Division staff regarding the MAEPP at the Division's regularly scheduled staff meetings;

2. A General Counsel memorandum will issue announcing a clear and definitive policy to all persons involved in the recruiting and hiring program with respect to how the goals or objectives of the MAEPP are to be met; and,

3. The General Counsel memorandum will include a statement that anyone who is unclear about the policies should seek clarification through their Assistant General Counsel (for Regional managers), or Division Heads (for Washington managers).

C. Three High-Level Appointments By The General Counsel

An OIG Investigation Disclosed That . . . Some 99 days prior to the end of his term, the General Counsel, in filling three high-level SES positions, did not observe the Agency's own announced policy with respect to the composition of an Executive Review Board in one of the cases; and, in another case, might have wastefully expended Agency funds, had the candidate not withdrawn. One of the positions, Deputy General Counsel, had been vacant, other than for persons serving in an acting capacity, for Mr. Hunter's entire four-year term. Another position, that of Associate General Counsel, Division of Enforcement Litigation, had been vacant since January 3, 1991 and had been filled only on an acting basis until the announcement on August 20. A third position, that of Deputy Associate General Counsel, Division of Operations-Management, had been vacant since April 22, 1992, and had never been filled by anyone in an acting capacity since that time.

At the outset of this investigation the OIG apprised the General Counsel of the complaint and suggested that the appointment process be delayed until the completion of the investigation, especially in light of the fact that the Form SF 52s had not yet been signed (even though the announcement of the appointments had been made). The General Counsel agreed with the suggestion and the investigation went forward.

Action Taken . The General Counsel rescinded the appointment of the Associate General Counsel, Division of Enforcement Litigation. No action was necessary with respect to the Deputy General Counsel position, because the candidate withdrew. The investigation revealed that no improprieties had taken place in connection with the third appointment - that of the Deputy Associate General Counsel in the Division of Operations-Management.

See Section 13 of this Semiannual Report for the Inspector General's comments concerning suggested legislation in this area.

D. Senatorial Request For Investigation Into Agency Contempt Litigation

An OIG Investigation . . . Initiated at the request of Senator Hank Brown of Colorado was conducted into whether the contents of a draft memorandum prepared by a Board Agent in Region 27, intended for submission to the Contempt Litigation Branch but mistakenly faxed to Respondent's counsel two days before Respondent was to present its evidence to the Board Agent, manifested a prejudging of the case.

Action Taken. .A Final Investigative Report was issued in which the conclusion was reached that there was no such manifestation, because: (1) the document was clearly marked "draft;" (2) Regional Office management had not seen or approved the contents of the document; (3) it is a Regional Director, and not Board Agents, who makes determinations about the merits of a case; (4) the intended recipients of the report were well aware that Respondent had not yet submitted its evidence, but nevertheless requested as much advance information as possible because of the time constraints under which they were working; and (5) the submission of a draft report which contained alternate conclusions based upon the prospective evidence of the Respondent was primarily driven by a Court imposed deadline for the filing of an amended petition seeking a contempt finding against Respondent.

E. Allegation That National Labor Relations Board Union National President Not Assigned Casehandling Responsibilities

An OIG Investigation Disclosed That. The National Labor Relations Board Union National President who occupies a position as a Field Examiner in a Regional Office has not been assigned any significant casehandling responsibilities for a substantial period of time and, instead, performs duties as a union official on government time. It was also disclosed that he is supplied with clerical assistance at government expense in support of his non-governmental, union functions on a volunteer basis.

There is a two-fold purpose in reporting the results of this investigation in this Semiannual Report. First, we find it therapeutic to report the results of significant investigations. Secondly, and of equal significance, since the allegations were made anonymously and there is no way to communicate the results of "no merit" determinations to anonymous complaining parties, this OIG, from time to time, includes such material as a means of communicating with the employee complement.

Action Taken. Based upon 5 U.S.C. Sec. 7131 and FLRA decisions which provide for the granting of official time in any amount the parties agree to be reasonable, necessary, and in the public interest for union representatives and for unit employees in connection with any matter covered by that statute, it was concluded that there was no misconduct involved in this practice and a report so stating was submitted to the General Counsel.

F. Agency Records Did Not Support Transfer Payments Made to Employee

An OIG Investigation Disclosed That. While the facts supported paying an employee for moving expenses incurred in a transfer aborted by the Agency for reasons of economy, the Agency had failed to document the decision to abort the transfer, making it appear as though the employee had received a substantial moving expense reimbursement after deciding not to transfer for personal reasons.

Action Taken. A report was submitted to the General Counsel recommending that the Agency fully document its decisions, something it did not do. The General Counsel advised that specific

instructions have been issued to ensure that any withdrawal of transfer offers in the future are fully documented.

G. Failure to Properly Classify Position

An OIG Investigation Disclosed That . . . The General Counsel, in posting the position of Program Analyst in the Finance Branch of the Division of Administration, classified the position in the GS-343 Management and Program Analysis series, rather than in the GS-334 Computer Specialist series, even though the job functions contained in the position description were heavily computer-oriented. The GS-343 series is used for positions involved in evaluating the effectiveness of government programs and operations or the productivity and efficiency of the management of Federal agencies or both. Analytical positions having as their paramount qualification requirement specialized subject matter knowledge and skills are specifically excluded in this series. The GS-334 Computer Specialist series, on the other hand, covers positions where the primary need is knowledge of information processing methodology/technology, computer capabilities, and processing techniques. Positions in this series involve, inter alia, analytical and evaluative work concerned with integrated systems of computer programs and/or computer equipment. The OPM Office of Classification advised the OIG that, based upon the position description and notice of vacancy, this position would be excluded from coverage by the GS-343 series.

Action Taken . . . The OIG issued a report to the General Counsel recommending that inasmuch as the new position of Program Analyst in the Finance Branch, position number 3821: (1) had been misclassified in the GS-343 series; (2) had probably been misgraded as a GM-13 rather than a GS-12; and, (3) the position description and notice of vacancy may also have defined the scope or manner of competition or the requirements for the position for the purpose of improving the prospects of a particular person for employment, the position be reclassified, the grading reviewed, and the position reposted so that all eligible candidates for the properly classified position will have an opportunity to apply. It was further suggested that the General Counsel review this matter to determine whether or not prohibited personnel practices occurred and take whatever additional action, if any, he may deem appropriate. The General Counsel replied that he was proceeding with filling the position upon advice received from the Office of Personnel Management, Washington Examining Services, Financial, Administrative and Social Sciences Division. Upon receiving that information, the OIG informed the General Counsel that it had received input from the OPM Office of Classification and that, before proceeding with his announced intention, it would be wise to consult with that group. No further communications have been received.

GENERAL MATTERS

1. Office of the General Counsel Fails to Make Timely Investigative Referral

During this reporting period, another instance arose of the Office of the General Counsel commencing an investigation without first consulting with the OIG to determine whether the

conduct complained of was potentially criminal in nature or whether the specialized skills possessed by the OIG investigative staff, as well as the IG's statutory authority to issue subpoenas, dictated that the matter should be investigated by the OIG. In fact, the General Counsel did not seek to ascertain the propriety of the OIG conducting the investigation until after the Regional Office, with the imprimatur of the General Counsel, had interviewed all of the witnesses of the complaining party and realized that the evidence suggested the possibility that a Regional Office employee may have been paid for divulging investigative file information. That possibility finally triggered the belief that the conduct, if true, might be criminal, despite the fact that the plain meaning of 18 U.S.C. 641 would appear to indicate that such conduct is a violation of the criminal code even if nothing is received in exchange for the delivery of Government records. That section of the United States Code is but one of the sections which the complained of conduct might have violated.

In the view of the OIG, the action of the General Counsel in not referring the matter substantially impacted upon the investigative result.

I have long taken the position that when it is unclear as to whether a matter should be investigated by the OIG, prior to the commencement of any investigation by another Agency entity into employee misconduct, the OIG should be consulted, informed of the facts, given an opportunity to do some research, and afforded the opportunity to indicate an interest in conducting the investigation itself. When I first took that position, at a time when we were attempting to negotiate a Memorandum of Understanding, I indicated that there probably would be times when the Office of General Counsel and the OIG would be in agreement that the OIG should or should not become involved; there would probably be other times when no agreement could be reached and then the General Counsel would make a determination, knowing that if I disagreed with that determination, I had a statutory duty to report those disagreements to the Congress. I also indicated, in an effort to alleviate the concern of the Associate General Counsel for the Division of Operations-Management that the process would be too time-consuming, that, as those discussions went on, a pattern would begin to emerge as to which kind of cases the OIG should become involved in and, therefore, the need for those discussions would diminish over a period of time. In fact, the concern of the Associate General Counsel appears to have been unfounded as there have been less than a handful of instances in the intervening years in which the Office of the General Counsel found it necessary to consult with the OIG.

In regard to this most recent episode, the General Counsel said on August 25, 1993 that he wanted to assure me that there was no attempt on his part to keep the investigation concealed from the OIG. Whether there was such an attempt or not misses the point. There should be consultations with the OIG before any investigation is commenced. If that were the case, we would have made great strides toward remedying the poor relationship that has existed for more than three and a half years between the OIG and the Office of the General Counsel. In addition, whatever expertise resides in the OIG might be brought to bear. The General Counsel agreed that consultations would help and that he would apprise Acting Deputy General Counsel Yvonne T. Dixon and Associate General Counsel William G. Stack. I indicated that apprising those two individuals would not be enough and that the policy should be communicated, in writing, to all Division and Branch heads. The General Counsel indicated that he would consider the matter

upon his return to the office. I asked to be provided with a copy of any written instructions provided to the General Counsel's staff. To date, I have been provided with nothing.

2. Review of Agency's Draft Accounting Documentation

At the Agency's request, the OIG reviewed the draft documentation setting forth the NLRB's accounting policies, procedures, processes and controls. We concluded that the documentation was adequate. Several items in the documentation required modification and the appropriate official was notified.

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)

Prior Semiannual Reports described several recommendations and/or suggestions for corrective action, most of which have been acted upon to completion. Those on which action remains to be taken or completed are treated separately below.

INVESTIGATION OF INVESTIGATION CONDUCTED BY DIRECTOR OF EQUAL EMPLOYMENT OPPORTUNITY

In the OIG Semiannual Report for the April - September, 1991 period, reference was made to an investigation conducted by the Director of Equal Employment Opportunity (DEEO) in which it was alleged the DEEO, while conducting an inquiry into legitimate concerns of the Office of Equal Employment Opportunity, had gone beyond those bounds and had inquired into an area unrelated to the mission of the EEO Office, that is, criticism of the General Counsel for delay in case processing.

The Agency response to the April - September, 1991 Semiannual Report noted that, in view of pending litigation before the Federal Labor Relations Authority (FLRA) regarding other aspects of the DEEO investigation, no action had been taken regarding the Final Investigative Report issued by the OIG.

The Agency response to the October 1, 1991 - March 31, 1992 Semiannual Report referred to an FLRA Administrative Law Judge's dismissal of an unfair labor practice complaint, to which exceptions had been filed by the FLRA General Counsel and National Labor Relations Board Professional Association (NLRBPA). On October 19, 1992, the FLRA issued a decision finding that the NLRB had violated the Federal Service Labor-Management Relations Statute when its DEEO interviewed one particular employee without affording the NLRBPA which represents that employee prior notice of, and an opportunity to be represented at, the interview, even though the NLRBPA had been given prior notice of, and an opportunity to be present at, the interviews of other unit employees.

The Agency, in its December 2, 1992 response to a Semiannual Report, noted, among other things, that "on November 13, 1992, the Agency notified the Federal Labor Relations Authority that it will comply with its decision, which requires the posting of a Notice to Employees."

The OIG, in its Final Investigative Report, had recommended that the General Counsel or his designee meet with the Division of Advice professional staff and inform them that: (1) it was unfortunate that a dual investigation impression had been created; (2) there was no intention to

create that impression; (3) the Director of Equal Employment Opportunity's Investigative Report did not include any information she had gleaned concerning criticism of the General Counsel; (4) no retaliation would occur; and, (5) steps would be taken to avoid a reoccurrence.

When the General Counsel responded that he had met with the Professional Association and given them an assurance of no reprisals being taken, the OIG, on July 22, 1993, asked what action if any had been taken with respect to the other four recommendations. On September 30, 1993, the General Counsel responded that in view of the meeting with the Professional Association, no further action would be taken.

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:

(1) With respect to Case No. OIG-I-41, following notice to the OIG on June 16, 1992 from Public Integrity Section of the Department of Justice (DOJ) that it was declining to prosecute the allegations concerning the subject of the investigation who allegedly: (a) used Agency clerical staff, while paid by the Agency, to perform services for another entity for whom the subject of the investigation was working; (b) used the Agency Printing Section to print a flyer for personal use; (c) used clerical staff, on Agency time, to stuff envelopes with the flyer printed by the Agency Printing Section; (d) used an Agency personal computer (PC) for personal work, including speeches allegedly written for non-Agency personnel for pay; (e) used an Agency PC to write speeches for persons addressing another entity for which the subject worked; (f) conducted business, on Agency time, for another entity for which the subject worked; and, (g) spent a portion of the work day meeting with visitors who were there to conduct business concerning the other entity for which the subject worked, the matter was referred, on the same date, to the Chairman for whatever administrative action was deemed appropriate.

Following a recommendation from the individual's supervisor as to what action should be taken, the Chairman suspended the individual involved for three days.

(2) In OIG-I-57, on July 10, 1992, we referred an alleged act of perjury to the United States Attorney in Ft. Worth, Texas. This case remains pending before the United States Attorney.

(3) On March 5, 1993, with respect to OIG-I-79, we referred a matter to a United States Attorney alleging potential violations of 18 United States Code Sections 208 and 1001. Since then, other referrals have been made based on other developments. The case concerns a Regional Office official who allegedly continued to act upon matters involving a Local Union, even though the President of that Local Union, the Regional Office official, and their respective spouses jointly owned real estate. Also involved is an allegation that the Regional Office official received gratuities from the Union or the President of that Union. This case remains pending before the United States Attorney.

(4) On September 9, 1993, with respect to OIG-I-93, we referred to a United States Attorney potential violations of 18 United States Code Sections 201, 209, 641, and 1505. The case

involved a Regional Office employee who allegedly divulged the contents of an investigative file to a relative who was employed by the charged party. On the same day, prosecution was declined. On September 23, 1993, the matter was referred to the General Counsel for whatever administrative action was deemed appropriate.

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 1993: none

Investigation Based Restitutions and/or fines - Civil:

FY 1993: none

Investigation Based Restitutions and/or fines - Criminal:

FY 1993: 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 OIG to include in a semiannual report 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.

On August 16, 1993, a request for information was made of the Chairman and General Counsel concerning the research that had been relied upon to refund \$16,671.39 to an individual, funds which were the subject of an OIG investigation. When no response was forthcoming, acknowledging that the first request may not have been interpreted as such, the OIG, on October 6, 1993, made another request for information.

In my second request, I noted that "the refund of \$16,671.39, a not insignificant amount, may have warranted a written justification. If so, I would like a copy of that document. If not written, I would like all citations of authority upon which the refund was made. I would also like to know if the refund was made spontaneously by [the Finance Branch Chief] or if it was in response to a request. If the latter, I would like a copy of any such request(s) as well as the response(s)."

The only responses received by the OIG up to the date of issuance of this Semiannual Report were: (1) a call by the Finance Branch Chief to the OIG Supervisory Auditor in which the former asked what documentation the OIG had so he could determine what he should give us, and (2) a meeting among the Finance Branch Chief, the Supervisory Auditor and the IG, in which the same request was made by the Finance Branch Chief. He was informed that the OIG request was very specific and his compliance with the OIG request was not dependent upon learning what

information the OIG already had. He was also informed that we wanted an answer as soon as possible.

Why it was necessary for the Finance Branch Chief to find out what the OIG already had is a mystery as he indicated that he had very little by way of documentation and that the money was refunded in the belief that he had no basis for not refunding it. Perhaps an inquiry of the OIG as to whether it was still conducting a criminal investigation might have supplied a basis.

Unfortunately, as of the date of publication of this Semiannual Report, the OIG has not received any further response.

Given the fact that reports of non-compliance under subsection (a) (1) or (3) are to be addressed to the head of the establishment and both the head of the establishment and the General Counsel are the persons of whom the requests were made, there is no recourse but to include this material in this Report.

SECTION 6

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

Dollar Value (in thousands of \$)

<u>AUDIT</u> <u>BY</u> <u>TYPE</u>	<u>REPORT</u> <u>NUMBER</u>	<u>QUESTIONED</u> <u>COSTS</u>	<u>UNSUPPORTED</u> <u>COSTS</u>	<u>RECOMMENDATIONS</u> <u>THAT FUNDS BE PUT</u> <u>TO BETTER USE</u>
FINANCIAL	OIG-F-5	- 0 -	- 0 -	\$162.3 ⁶

⁶ This amount is attributable to the Audit concerning Controls Over Capitalized Property.

SECTION 7

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

"A REVIEW OF THE NATIONAL LABOR RELATIONS BOARD'S CONTROLS OVER CAPITALIZED PROPERTY," CASE NO. OIG-F-5

Agency's capitalized inventory system removed from high risk list, but further action needed

The Agency's inventory system for capitalized property has been removed from the Office of Management and Budget's high risk list, because the Agency established an inventory record which was reconcilable with the accounting records.

However, further action is needed so that Agency records and reports accurately reflect the results of NLRB operations. For example, at the end of Fiscal Year 1992, the Agency's records showed capitalized property of \$672,814, an amount which the OIG believes understated those assets by \$3,130,472. The amount reflected on Agency records represented less than 18 percent of the NLRB's actual investment in property. An additional \$282,280 of capitalized property, acquired during Fiscal Year 1993, had not been recorded as Agency assets. The assets valued at \$282,280 were acquired through capital leases under which \$232,319 remained in unfunded liabilities payable by the Agency in future years should the leases remain in effect. These unfunded liabilities had not been recorded in the Agency's accounts.

Among the audit findings were:

- ◆ The Agency did not properly monitor a contractor's deliveries of ADP goods and services costing over \$3 million. At the time of each delivery, the NLRB was not provided, and did not compile, a record which set forth the goods and services received and accepted by the Agency. As a result, no check was made at the time of delivery as to what was actually received. The NLRB made payments based on the vendor's invoices which billed the Agency for amounts due but did not list or describe equipment, software, services, and other items provided by the contractor;⁷

- ◆ Acquisitions and disposals of capitalized property were not posted to the inventory record in a timely manner. Inadequate procedures were utilized in conducting the physical inventories of capitalized property and other computer equipment at the Regional Offices;

⁷ Although the Agency agreed with the recommendation concerning this finding, it disagreed with the factual basis underlying the recommendation.

- ◆ Over \$731,000 of assets acquired through capital leases were inappropriately treated as annual operating expenses;
- ◆ More than \$100,000 of peripheral equipment and materials which augmented the operation of equipment were erroneously excluded from the value of those assets;
- ◆ A single integrated system which was a configuration of many ADP items costing \$249,979 had not been recorded as an asset; ⁸
- ◆ Five procurements totaling about \$2,200,000 for computers and software were considered an expense in the year acquired instead of being recorded as an asset, thus distorting the Agency's annual operating costs;
- ◆ NLRB's annual report on financial position did not properly describe capitalized property of the agency;
- ◆ Documents needed to establish the capitalized value of assets were not retained;
- ◆ Unliquidated obligations of \$162,288 were invalid and unnecessarily remained on the financial records, because a contractor was paid under incorrect document numbers; and,
- ◆ Appropriately, items sensitive to loss or theft were under inventory control.

Recommendations

The report contained 28 recommendations which, if implemented, would strengthen controls over Agency assets and enable the NLRB to properly record its transactions and report on the results of its operations. We recommended, among other things, that: the acquisition of items acquired through lease to ownership agreements be recognized as capital leases; peripheral equipment and materials which make an item operational be considered part of that asset; items purchased in large quantities be capitalized if the items have a service life of at least two years; and, goods and services not be accepted from a contractor unless there is a record of the items being delivered.

The General Counsel agreed in full with 21 of the 28 recommendations, agreed with 2 others with modifications, and rejected 5 in their entirety.

⁸ The Agency disputed this and the following finding and disagreed with the corresponding 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) ⁹**

	<u>Dollar Value (thousands of \$)</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 -

⁹ 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 (thousands of \$)</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	1	\$8.3 ¹⁰
B. Reports issued during the reporting period	1	\$162.3 ¹¹
Subtotal (A + B)	2	\$170.6
C. For which a management decision was made during the reporting period:		
(i) Recommendations agreed to by management	1	\$8.3
(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	1	\$162.3

¹⁰ This amount is attributable to the Audit concerning Advisory and Assistance Services.

¹¹ This amount is attributable to the Audit concerning Controls Over Capitalized Property.

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)**

Not applicable.

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)**

Not applicable.

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. Among those items reviewed during this reporting period were the following which fall within the mandate of the above-cited section of the Act.

LEGISLATION PROPOSED IN THE CONGRESS:

Two bills introduced during this reporting period would extend the jurisdiction of the Agency, thereby increasing its work. H.R. 2099, introduced on May 12, 1993, would require the Congress to comply with the laws which it requires others to comply with, including the NLRA. H.R. 2739, introduced on July 26, 1993, would amend the Metropolitan Washington Airports Act of 1986 to apply the NLRA to labor-management relations between the Airports Authority and labor organizations representing bargaining units at the Metropolitan Washington Airports.

As noted in previous reports, any measure extending the Agency's jurisdiction would have an impact on the economy and efficiency of the Agency by requiring either additional funding, more efficient use of resources, or the reallocation of resources from other areas. In terms of the OIG, these bills would not affect its ability to detect and prevent waste, fraud, and abuse, unless the OIG lost resources in order to accommodate another program or operation.

LEGISLATION SUGGESTED BY THE OIG:

One investigation performed during this reporting period involved the announcement of the filling of three high-level SES positions by General Counsel Jerry M. Hunter on August 20, 1993, some 99 days prior to the end of his term. One of the positions, Deputy General Counsel, had been vacant, other than for persons serving in an acting capacity, for Mr. Hunter's entire four-year term. Another position, that of Associate General Counsel, Division of Enforcement Litigation, had been vacant since January 3, 1991. A third position, that of Deputy Associate General Counsel, Division of Operations-Management, had been vacant since April 22, 1992, and had never been filled by anyone in an acting capacity since that time.

As discussed elsewhere in this report (Section 1), the appointee to the position of Deputy General Counsel withdrew, and the appointment of the individual to the position of Associate General Counsel, Division of Enforcement Litigation, was rescinded because the Agency's published policies and procedures were not followed in making the selection. It is nonetheless the view of the Inspector General that political appointees should not make high-level SES appointments, to either career or noncareer positions, within the last 120 days of their term of office in order to afford a new administration flexibility in making executive resource decisions and to avoid unnecessary expense to the agency. In this instance, for example, substantial Agency resources might have been expended in paying relocation expenses and in higher salary expenses for a short-term incumbent. This result would adhere because of the Agency's practice of continuing to pay SES career appointees at their highest salary level irrespective of what functions they may subsequently perform for the Agency.

Federal Personnel Manual Supplement 920-1, the Operations Handbook for the Senior Executive Service, already contains a provision at Section S5-4 d (7) whereby OPM normally suspends the processing of cases involving a Qualifications Review Board's certification of the qualifications of new SES career appointees when an agency head is leaving. The OPM guidance allows an agency to request OPM to forward a case which it considers urgent, and sets forth factors such as whether the new agency head would have personal interest in the submission, the organizational level of the position, the degree to which the candidate would be involved in policy matters, and how long it appears it will be before a new agency head is appointed, in considering whether to go forward with a particular appointment. The Inspector General believes that a similar process should apply with respect to all SES appointments made within 120 days of the end of a political appointee's term of office.

APPENDIX A

DEFINITIONS USED IN SECTIONS 8 AND 9

As used in this Semiannual Report, 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.

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 1966; 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.

YOUR CALL OR LETTER MAY BE MADE ANONYMOUSLY

IF YOU WISH