

INSPECTOR GENERAL



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## NATIONAL LABOR RELATIONS BOARD

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WASHINGTON, DC 20570

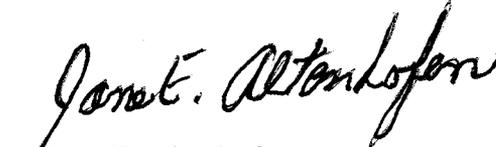
I hereby submit this Semiannual Report: April 1 – September 30, 2005, which summarizes the major activities and accomplishments of the Office of Inspector General (OIG) of the National Labor Relations Board (NLRB or Agency). The submission of this report is in accordance with the Inspector General Act of 1978, as amended (IG Act). Section 5 of the IG Act requires that the Chairman transmit this report to the appropriate committees or subcommittees of the Congress within 30 days of its receipt.

In the audit program, OIG issued three audit reports, three inspection reports, and one issue alert. In the investigations program, OIG processed 83 contacts, initiated 9 cases, and closed 9 cases. The investigations resulted in 6 administrative actions and \$283 in investigative recoveries. We reviewed five pieces of legislation and made one policy comment. Details on these accomplishments can be found in the body of this report.

During this reporting period, the OIG devoted its audit resources to reviewing the administration of the Agency. It is noteworthy that while doing so we reached agreement with the Agency on our recommendations without devoting a significant amount of time resolving comments or disagreements. This is a significant accomplishment for both the Agency and the OIG. Our work covered a wide spectrum of areas including personnel, finance, information technology, and Agency records. Our investigative resources were focused in large part on employee misuse of the Agency's Internet access, but also included areas involving conflict of interests, false claims and statements, and travel.

In October, along with 17 other Agency employees, I volunteered to assist the Federal Emergency Management Agency with Katrina disaster relief. While assigned to a Disaster Recovery Center in Tylertown, Mississippi, I was impressed with the honesty and stoicism of the many people affected by this disaster.

I appreciate the support of all Agency employees in achieving the accomplishments set forth in this report.

  
Jane E. Altenhofen  
October 31, 2005

## AGENCY PROFILE

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The National Labor Relations Board (NLRB or Agency) is an independent Federal agency established in 1935 to administer the National Labor Relations Act (NLRA). The NLRA is the principal labor relations law of the United States, and its provisions generally apply to private sector enterprises engaged in, or to activities affecting, interstate commerce. NLRB jurisdiction includes the U.S. Postal Service (other government entities, railroads, and airlines are not within NLRB's jurisdiction).

The NLRB seeks to serve the public interest by reducing interruptions in commerce caused by industrial strife. It does this by providing orderly processes for protecting and implementing the respective rights of employees, employers, and unions in their relations with one another. The NLRB has two principal functions: (1) to determine and implement, through secret ballot elections, the free democratic choice by employees as to whether they wish to be

represented by a union in dealing with their employers and, if so, by which union; and (2) to prevent and remedy unlawful acts, called unfair labor practices, by either employers or unions.

NLRB authority is divided by law and delegation. The five-member Board primarily acts as a quasi-judicial body in deciding cases on formal records. The General Counsel investigates and prosecutes unfair labor practices before administrative law judges, whose decisions may be appealed to the Board; and, on behalf of the Board, conducts secret ballot elections to determine whether employees wish to be represented by a union.

The Board consists of the Chairman and four Members who are appointed by the President with the advice and consent of the Senate. Board Members serve staggered terms of 5 years each. The General Counsel is also appointed by the President with the advice and consent of the Senate and serves a 4-year term.

Two vacant seats remain on the five-Member Board. Robert J. Battista continues to serve as Chairman along with two other Board Members, Wilma B. Liebman and Peter C. Schaumber. Board Member Schaumber received a recess appointment on August 31, 2005, after his original term expired on August 27, 2005.

On June 30, 2005, Arthur F. Rosenfeld was designated as the Acting General Counsel, his original term as General Counsel expired on June 3, 2005. Also, on June 30, 2005, former Board Member Ronald E. Meisburg was nominated for a 4-year term as General Counsel.

The NLRB received an appropriation of \$251,875,000 for Fiscal Year (FY) 2005,

less an across-the-board rescission of .80 percent, leaving a net spending ceiling of \$249,860,000 to fund an expected ceiling of 1,865 full-time equivalents. NLRB Headquarters is at 1099 14<sup>th</sup> Street, NW, Washington, DC.

In addition to the Headquarters building, employees are located in 51 field offices throughout the country. Three satellite offices for the Administrative Law Judges are located in Atlanta, San Francisco, and New York. Since October 2, 2000, field offices included 32 Regional Offices, 16 Resident Offices, and 3 Subregional Offices.

Additional information about the NLRB can be found on the Web site [www.NLRB.gov](http://www.NLRB.gov).

## OFFICE OF INSPECTOR GENERAL

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NLRB established the Office of Inspector General (OIG) pursuant to the 1988 amendments to the Inspector General Act of 1978 (IG Act).

### Resources

The FY 2005 OIG budget was \$1,103,000 for operations, of which \$169,000 was for contract services. In addition to the Inspector General, the OIG consists of a Counsel/Assistant

Inspector General for Investigations, Assistant Inspector General for Audits, an investigator, three auditors, and a staff assistant.

The Inspector General is to provide policy direction for and is to conduct, supervise, and coordinate audits relating to program operations of the Agency. *OIG issued three audit reports, three inspection reports, and one issue alert.*

### Reports Issued

- We issued Audit Report  
OIG-AMR-47-05-04, *Non-Standard Work Hours Compensation*, on August 9, 2005. We conducted this review to assess whether management controls provided adequate assurances that overtime, compensatory time, and credit hours were properly authorized and approved and whether records were complete and accurate.

We generally found that controls over the earning and using non-standard work hours were not sufficient and related records in the Agency's payroll system were not complete and accurate.

Authorizations to work compensatory time were generally not documented, and only one office reviewed designed forms to approve and document non-standard work hours that captured all pertinent data.

Three offices were not recording some or all compensatory time in the Agency official payroll records.

Each office reviewed had employees that used annual leave before liquidating compensatory leave, although Agency policy is that, normally, compensatory leave should be used first. Two employees in our sample that retired in 2004 were paid a combined total of \$2,900 for compensatory leave that could have been avoided by enforcing the policy.

Additionally, three employees that retired at the end of 2004 were allowed to carry credit hours for an extended period, resulting in \$3,000 in payments to the employees that could have been avoided.

Management agreed with our recommendations.

- We issued Audit Report OIG-AMR-48-05-05, *Safeguarding Social Security Numbers*, on August 31, 2005. We conducted this audit to assess the adequacy of the Agency's controls over the access to, disclosure of, and use of Social Security Numbers (SSNs) by external entities. This audit included SSNs of Agency employees, vendors, and those collected by program offices for case processing purposes.

The Agency uses SSNs as required by Federal laws and regulations to identify employees and vendors. Additionally, Regional Offices collect SSNs to help locate parties in unfair labor practice cases and to use in cases in which backpay is a potential remedy.

Generally, the Agency had adequate controls over SSNs when processing records requested under the Freedom of Information Act (FOIA). Three of the four Regional Offices visited adequately secured employee related documents. Also, workday physical inspections of the Regional Offices visited, Security Branch, Office of Employee

Development, and Procurement and Facilities Branch, did not find any instances of unsafeguarded SSNs. We did observe, however, a few instances at Headquarters in which documents containing personal information, including SSNs, were left in an unsecured manner while the employees in custody were away from their work area.

We determined that improvements were needed to comply with the Privacy Act of 1974 and that the Agency used forms to collect SSNs that did not have the Privacy Act disclosure.

One Regional Office did not maintain some personnel records in accordance with Federal regulations or an Agency Privacy Act System of Records notice. The Agency had not published a system of records notice related to Regional Office case files.

Management agreed with our recommendations.

- We issued Audit Report OIG-AMR-49-05-06, *NLRB Technology Initiatives as Related to the Rehabilitation Act*, on September 26, 2005. We initiated this audit to evaluate the Agency's compliance with sections 501 and 508 of the Rehabilitation Act.

NLRB provides reasonable accommodations consisting of assistive technology devices and services through the Department of Defense Computer/Electronic Accommodations Program (CAP) at no cost to the Agency. During FY 2004, eight employees were provided reasonable accommodations that included six pieces of assistive technology. In addition, CAP provided training to use a screen reader and the evaluation of a work station. These items would have cost approximately \$4,350 had they been purchased by the Agency.

No electronic and information technology reasonable accommodation requests were denied. The Human Resources Branch received nine reasonable accommodation requests

related to electronic and information technology in FY 2004. Eight of these requests were filled. One request was not processed because the employee failed to provide the necessary supporting medical documentation.

The Agency's Internet and Intranet pages were generally in compliance with section 508 requirements. Some pages included data tables that did not identify row and column headers appropriately, and some pages were not readable by assistive technology. The most common deficiency was that many Internet pages did not meet the requirement to provide users a method to skip repetitive navigation links.

The Chief Information Officer had no comment on the findings and completed corrective actions for the two recommendations made in the draft report. Therefore, we had no recommendations in the final report.

- We issued Inspection Report OIG-INS-36-05-02, *FOIA Processing*, on June 10, 2005. We initiated this inspection to determine whether the NLRB filled requests for information made under FOIA in a timely manner.

The Agency responded to FOIA requests in a timely manner. In FY 2004, the Agency processed 5,295 requests in a median of 9.5 days, substantially under the 20-day period allowed by regulations. A majority of FOIA requests were granted in full in most of the offices reviewed. Generally, the number of FOIA requests received by the Agency decreased over the past 6 years from a high of 6,268 requests in FY 1998 to a low of 5,193 requests in FY 2004.

In instances when the Agency did not respond to a FOIA request within 20 days, some offices reviewed did not usually provide the required written notice to the requester. FOIA logs or databases for some offices had data elements with exception rates in excess

of 10 percent, a rate that we consider significant. Two offices did not compute working days in accordance with FOIA guidelines. These inconsistencies made the Agency appear to respond to requests in a less timely manner than it actually did.

- We issued Inspection Report OIG-INS-38-05-03, *Agency Retirement Records*, on September 15, 2005. We initiated this inspection to assess whether the Agency is maintaining the appropriate records for retirement deductions.

The Agency does not maintain the records for employee retirement deductions. The Department of the Interior's National Business Center (NBC), which provides payroll services to the Agency, maintains the records for retirement deductions made since September 2002. The Agency's previous retirement records have been sent to the Office of Personnel Management (OPM). NBC also certifies the retirement records and submits them to

OPM when an employee separates from the Agency.

- We issued Inspection Report OIG-INS-37-05-04, ***Interagency Balances***, on September 27, 2005. We initiated this inspection to review the process for recording and reconciling interagency account balances.

NLRB is required to reconcile certain balances with OPM and Department of Labor (DOL). The Finance Branch (Finance) reconciled the required OPM amounts. Finance confirmed Federal Employee's Compensation Act liability and expense amounts for DOL as correct, but did not reconcile the amounts to the NLRB records.

The Agency is not required to and did not reconcile balances with other agencies. Finance relies upon individual NLRB offices to reconcile charges for services received under agreements with other agencies. Amounts charged were not verified by NLRB offices.

We identified delays by other agencies in charging NLRB for amounts due and NLRB delays in charging other agencies. These delays could result in not having information on funds available in time to use them before they expire.

NLRB continued to bill for some FY 2005 services at 1998 rates, instead of actual cost. One agency was billed less than the amount in the interagency agreement, a difference of \$712.

- We released Issue Alert OIG-IA-05-03, ***Processing Time Off Awards***, on July 1, 2005. During an investigation, it came to our attention that a Region was documenting time off awards by e-mail messages rather than processing personnel actions and properly recording the award and its use in the Agency's time and attendance system. We reminded the Agency that such awards must be supported by a written justification and processed through a personnel action. We noted that this type of informal recording of time and attendance information does

not meet OPM's accurate and timely standard.

### **Audit Follow-up**

Agreed upon actions were not completed within 1 year on three audit reports.

- ***Information Security Review of New Automated Systems***, OIG-AMR-40-03-03, was issued on September 22, 2003, and we reached agreement with management on actions needed to implement the eleven recommendations on that date. Action was completed on 10 of the 11 recommendation. Management is working to implement the remaining recommendation.
- ***Review of Data Accuracy in the FY 2001 Annual Report***, OIG-AMR-39-03-04, was issued on September 30, 2003. We reached agreement with

management on actions needed to implement the recommendation on December 1, 2003. The agreed upon actions included having the Agency conduct a study to determine whether the Agency will produce an annual report and, if so, in what form. Senior Agency officials are evaluating a report prototype. A final determination has not been made.

- ***Audit of Archiving Case Files***, OIG-AMR-43-04-03, was issued on September 20, 2004, and we reached agreement with management on actions needed to implement the 10 recommendations on that date. Actions were completed on 5 of the 10 recommendations. Management is working to implement the remaining recommendations.

## INVESTIGATIONS PROGRAM

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The Inspector General is to provide policy direction for and is to conduct, supervise, and coordinate investigations relating to the programs and operations of the Agency. *OIG processed 83 contacts, initiated 9 cases, and closed 9 cases. The investigations resulted in 2 resignations, 1 suspension, 3 counselings, \$283 in investigative recoveries, and a resignation of a contractor's employee. The Department of Justice declined prosecution of two matters.*

Case Workload		Contacts Processed	
Open (4/1/2005)	9	Received	83
Initiated	9	Initiated Investigation	2
Closed	9	Opened Case -- Referred to Agency	0
Open (9/30/2005)	9	Non-Investigative Disposition	81

• **Sexually Explicit Internet Material.** **Material.** **OIG** initiated this case following a referral of an allegation from Agency management that the subject was using his Government computer to view sexually explicit material on the Internet. Using forensic software, we substantiated the allegation. We also found evidence that the subject received prior warnings regarding this type of misconduct. When interviewed, the subject admitted that he engaged in this misconduct for several years preceding our investigation. After we issued our investigative report, the subject and the

Agency entered into an agreement for his resignation. (OIG-I-372)

In another matter, **OIG** initiated a case after a proactive review of the Agency's Internet firewall logs identified the subject's activity involving viewing sexually explicit material on the Internet. Again, using forensic software, we substantiated the allegation. When interviewed, the subject admitted that he engaged in this misconduct for several months preceding our investigation. Following the issuance of our

investigative report, the subject received a written reprimand. (OIG-I-375)

- **Outside Business Activity.**

OIG initiated this case after a proactive review of the Agency's Internet firewall logs provided information to support an allegation that the subject was engaged in an outside business using the Agency's Internet access and the Government computer at his desk. Using forensic software, we substantiated the allegation. When interviewed, the subject admitted that he engaged in this misconduct by managing six Web based businesses during official time and by using Agency resources. The subject also stated that he engaged in this misconduct for about 18 months. The employee resigned after being interviewed by the OIG. (OIG-I-378)

- **Authorized Access of Information and Harassment.** OIG initiated this case after Agency management referred a matter regarding an allegation that subject was making harassing telephone calls to the family members of a fellow

employee. Our investigation substantiated that the subject used the Agency's access to Choice Point, a database service that provides personal information about individuals, to obtain information about the employee's family. The subject then used the Agency's Internet access to obtain the telephone numbers of the employee's family members. When interviewed, the subject admitted engaging in this misconduct. After we issued an investigative report, the subject received a 30-day suspension. (OIG-I-373)

- **False Claim.** OIG initiated this case following a referral by Agency management of an allegation that an employee had an improper relationship with a contractor's employee that resulted in a conflict of interest. Although our investigation did not substantiate the allegation, we reviewed travel claims submitted by the contractor's employee and substantiated that he submitted \$283 in false claims for travel related expenses. The contractor's employee refused to cooperate with our investigation.

Following the issuance of our investigative report, the contract employee resigned his position with the contractor and the contractor withdrew the employee's travel claims. The Department of Justice (DOJ) declined prosecution. (OIG-I-366)

- **False Statement.** OIG initiated this case after receiving a Hotline complaint that an office allowed two employees to engage in the work-at-home program while each cared for an infant child. Although we did not substantiate the allegation, we did find that one of the employees provided false information to the OIG regarding leave usage during the relevant period of time. Following the issuance of our investigation report, that employee received a written reprimand for the false statement. DOJ declined prosecution. (OIG-I-371)

- **Improper Use of Government E-Mail.** OIG initiated this case after receiving a Hotline complaint alleging that an employee used the Agency e-mail system to send messages of a political nature to District of Columbia

officials. Our investigation disclosed that the subject sent 21 such messages between April and May 2005. When interviewed, the subject admitted sending the messages and that a person could find that the messages were political in nature. Following the issuance of our report, the subject was orally counseled.

(OIG-I-374)

- **Travel Benefits.** OIG initiated this case after an audit disclosed that the Agency was providing travel renewal benefits to two employees that were transferred to offices outside the continental United States (CONUS). We found that the employees are not on renewable tours, but rather were permanently reassigned to their duty stations. We provided a memorandum to the Agency expressing our belief that tour-renewal travel was not intended or authorized for these employees and that the Comptroller General stated that ordinarily tour-renewal agreement travel is to be performed between tours of duty outside of CONUS. Agency managers

are currently considering the issues raised in our memorandum. (OIG-I-370)

- **Authorization to Practice Law.**

OIG initiated this investigation after a proactive review of the certifications to practice law that are completed by the Agency's attorneys. Our investigative efforts disclosed that the subject failed to re-register and pay the appropriate fees to maintain her status to practice law. When interviewed, the subject explained that the failure to pay the registration fee on time was an oversight. During the investigation, the subject paid the appropriate fees. Because the subject completed the re-registration process and was not suspended from the practice of law, we determined that no further investigative efforts were necessary and that the OIG would not issue an investigative report. (OIG-I-379)

### **Hotline**

Employees and members of the public with information on fraud, waste, and

abuse are encouraged to contact OIG. A log of calls to a nationwide toll free number or the office numbers and a log of mail, e-mail, and facsimile messages are maintained. All information received, regardless of the method used, is referred to as **HOTLINE** contacts.

The information received over the hotline is the basis for the initial review for potential investigations. The information is analyzed to determine if further inquiry is warranted. Most **HOTLINE** contacts are calls from members of the public seeking help on an employment related problem or issues outside OIG and/or Agency jurisdiction. As appropriate, OIG refers these callers to the Regional Office; local, state, or Federal agency; or private resource to provide assistance.

During this reporting period, OIG received 83 hotline contacts, of which 32 were telephone calls and 51 were in writing. Two contacts resulted in OIG investigative cases.

## LEGISLATION, REGULATIONS, AND POLICY

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The Inspector General is to review existing and proposed legislation and regulations relating to programs and operations of the Agency and is to make recommendations concerning the impact of such legislation or regulations. Similarly, we review Agency and OIG policy. *We reviewed five pieces of legislation and provided one comment.*

### Legislation

We reviewed the following legislation and provided input when appropriate.

**H.R. 2489, Improving Government Accountability Act.** This legislation amends the IG Act to establish a 7-year term of office for a person appointed as an Inspector General with provisions for removal for cause, provides for law enforcement authority at certain designated Federal entities, formally establishes an Integrity Committee for the review of allegations of misconduct involving an Inspector General and certain OIG staff, and considers each OIG to be a separate Federal agency with the authority to transmit an appropriation estimate to OMB and appropriate Congressional committees.

**S. 636.** This legislation amends the IG Act to require the Inspector General of the DOJ to prepare semiannual reports on settlement or compromise of any

claim, suit, or other action entered into with DOJ that relates to an alleged major fraud or false claim against the United States or results in a claim of damages in excess of \$100,000.

**H.R. 3403.** This legislation would amend the NLRA to provide for inflation adjustments to the mandatory jurisdiction thresholds of the NLRB.

**H.R. 1696, Employee Free Choice Act.** This legislation would amend the NLRA to require the NLRB to certify a bargaining representative without directing an election if a majority of the bargaining unit employees have authorized designation of a representative and there is no other individual or labor organization currently certified or recognized. It also sets forth procedural requirements for the initial collective-bargaining agreement and revises enforcement

requirements for unfair labor practices during union organizing drives.

**S. 1173, Secret Ballot Protection Act of 2005.** This legislation would amend the NLRA to make it an unfair labor practice for: (1) an employer to recognize or bargain collectively with a labor organization that has not been selected by a majority of the employees in a secret ballot election conducted by the NLRB; and (2) a labor organization to cause or attempt to cause an employer to recognize or bargain collectively with a representative that has not been selected in such a manner.

### **Legislative Policy**

We responded to the U.S. Office of Government Ethics' request for

comments concerning the **conflict of interest statutes**. We stated that the underlying ethical concerns reflected in the statutes remain relevant to the function of the Government. We noted that certain conflict of interest statutes could be reviewed to ensure adequate coverage for employees of contractors as well as expanded to address many types of personal relationships in today's society that can affect a person's impartiality.

### **Regulations**

The Counsel to the Inspector General is an advisory member of the Agency's Rules Revision Committee that develops changes to Agency procedural regulations. During this reporting period, the committee reviewed proposed debt collection regulations.

## LIAISON ACTIVITIES

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The Inspector General is to recommend policies for, and is to conduct, supervise, or coordinate relationships between the Agency and other Federal agencies, state and local governmental agencies, and non-governmental entities. The Inspector General is to give particular regard to the activities of the Comptroller General of the United States. Similarly, we encourage OIG staff members to participate in Agency programs and activities. *OIG staff are active in the inspector general community and Agency functions.*

### **Inspector General Community**

- The Inspector General is a member of the Executive Council on Integrity and Efficiency (ECIE), which consists primarily of the inspectors general at the designated Federal entities in the IG Act. She participated in activities sponsored by the President's Council on Integrity and Efficiency (PCIE), which consists primarily of the Presidentially-appointed inspectors general. She joined the Audit Committee in May 2001.

The Assistant Inspector General for Audits, or designated auditors, participated in the Federal Audit Executives Council (FAEC), Financial Statement Audit Network, Statement of Work Subgroup, Results Act Group, IDEA Users Group, and the FAEC Information Technology Security Committee.

The Counsel participated in the Council of Counsels to Inspectors General. The Counsel and an auditor are members of a PCIE/ECIE committee reviewing issues associated with e-government initiatives.

Two auditors and the Counsel were selected to receive an ECIE Award for Excellence.

### **Government Accountability Office**

The IG Act states that each inspector general shall give particular regard to the activities of the Comptroller General of the United States, as head of the Government Accountability Office, with a view toward avoiding duplication and ensuring effective coordination and cooperation. No reviews of NLRB are currently ongoing.

## **INFORMATION REQUIRED BY THE ACT**

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Certain information and statistics based on the activities accomplished during this period are required by section 5(a) of the IG Act to be included in the semiannual reports. These are set forth below:

### **Section 5(a)**

- (1), (2), (7)      OIG did not identify significant problems, abuses or deficiencies relating to the administration of programs. For the purpose of this section, we used the definition of significant as set forth in the Federal Managers' Financial Integrity Act.
  
- (3)                Corrective action has not been completed on all significant recommendations that were described in the previous semiannual reports.
  
- (4)                Two cases were referred to prosecutorial authorities. There were no prosecutions or convictions.
  
- (5)                No reports were made to the Chairman that information or assistance requested by the Inspector General was unreasonably refused or not provided.
  
- (6)                A listing by subject matter is located on page 18.
  
- (8), (9)          No audit reports issued during this period had a recommendation on questioned costs. No audit reports issued during this period identified funds that could be put to better use. See Tables 1 and 2.
  
- (10)              There are no audit reports issued before the commencement of the reporting period for which no management decision has been made by the end of the reporting period.
  
- (11)              No significant revised management decisions were made during the reporting period.
  
- (12)              There were no significant management decisions with which I am in disagreement.

## **AUDIT REPORTS BY SUBJECT MATTER**

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<b><u>Report Title and Number</u></b>	<b><u>Questioned Costs</u></b>	<b><u>Unsupported Costs</u></b>	<b><u>Ineligible Costs</u></b>	<b><u>Funds To Be Put To Better Use</u></b>
ADMINISTRATION				
Non-Standard Work Hours Compensation, OIG-AMR-47-05-04	0	0	0	0
Safeguarding Social Security Numbers, OIG-AMR-48-05-05	0	0	0	0
NLRB Technology Initiatives as Related to the Rehabilitation Act, OIG-AMR-49-05-06	0	0	0	0

**Table 1****REPORTS WITH QUESTIONED COSTS**

	<u>Number of Reports</u>	<u>Dollar Value</u>	
		<u>Questioned Costs</u>	<u>Unsupported Costs</u>
A. For which no management decision has been made by the commencement of the period	0	0	0
B. Which were issued during the reporting period	0	0	0
Subtotals (A+B)	0	0	0
C. For which a management decision was made during the reporting period	0	0	0
(i) Dollar value of disallowed costs	0	0	0
(ii) Dollar value of 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
Reports for which no management decision was made within six months of issuance	0	0	0

**REPORTS WITH RECOMMENDATIONS  
THAT FUNDS BE PUT TO BETTER USE**

**Table 2**

	<b><u>Number of Reports</u></b>	<b><u>Funds Be Put To Better Use</u></b>
A. For which no management decision has been made by the commencement of the period	0	0
B. Which were issued during the reporting period	0	0
Subtotals (A+B)	0	0
C. For which a management decision was made during the reporting period	0	0
(i) Dollar value of recommendations that were agreed to by management	0	0
(ii) Dollar value of recommendations that were 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
Reports for which no management decision was made within six months of issuance	0	0

*Every employee is the  
guardian of integrity.*



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