

## **Highlights**

#### **Agency Model Practices**

- Ensuring consistency throughout the ethics program by holding monthly Agency Ethics Council meetings
- Raising employee awareness by displaying ethics-related posters around DOI

# OGE Suggestion for OSM and OST

■ Consider delegating ethics responsibilities to other staff

#### **OGE Suggestion for OSM**

■ Re-evaluate the requirement that all employees file financial disclosure reports

#### **OGE Suggestion for OST**

■ Ensure the accuracy of the master list of filers

If you have comments or would like to discuss this report, please contact Trish Zemple, Associate Director for Program Reviews, at 202-482-9286 or pczemple@oge.gov.

## Ethics Program Review

## **U.S. Department of the Interior**

February 2010 Report

### **Executive Summary**

The Office of Government Ethics (OGE) has completed its review of the ethics program at the U.S. Department of the Interior's (DOI) Office of Surface Mining Reclamation and Enforcement (OSM) and Office of the Special Trustee for American Indians (OST). OGE determined that the ethics program at OSM appears to meet minimum regulatory compliance. However, certain aspects of the program could be improved. OGE could not determine whether the ethics program at OST meets minimum regulatory compliance because (1) OST could not confirm the accuracy of the master list of filers or the number of employees required to receive annual training and (2) due to the limited number of pieces of counseling provided by OST, OGE was unable to perform a comprehensive analysis of OST's counseling services.

OGE hopes that implementation of Secretarial Order No. 3288, Enhancing and Promoting an Ethical Culture within the Department of the Interior (Order) will address the issues in both programs. Therefore, OGE has not made any formal recommendations but has made suggestions for improvement. Because having an accurate master list of filers is an essential component of both the financial disclosure and training elements of a successful ethics program, OGE will follow-up with OST to ensure this task has been completed.

OGE also reviewed some elements of the DOI Departmental Ethics Office (DO). Because of the limited scope of the review at the DO, OGE did not make a compliance determination. OGE did note two model practices that the DO has implemented.

This report has been forwarded to DOI's Designated Agency Ethics Official and DOI's Inspector General.



### **Ethics Program Review**

## U.S. Department of the Interior Office of Surface Mining Reclamation and Enforcement and Office of the Special Trustee for American Indians

February 2010 Report

#### Introduction

#### **OGE MISSION**

The U.S. Office of Government Ethics (OGE) provides leadership for the purpose of promoting an ethical workforce, preventing conflicts of interest, and supporting good governance initiatives.

#### PURPOSE OF A REVIEW

The purpose of a review is to identify and report on the strengths and weaknesses of an ethics program by evaluating (1) agency compliance with ethics requirements found in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures in place for administering the program.

#### REVIEW AUTHORITY AND SCOPE

OGE has the authority to evaluate the effectiveness of executive agency ethics programs. *See* Title IV of the Ethics in Government Act of 1978, as amended (the Ethics in Government Act), and 5 CFR part 2638. OGE's review of the U.S. Department of the Interior's (DOI) Office of Surface Mining Reclamation and Enforcement (OSM) and Office of the Special Trustee for American Indians (OST) focused on the elements listed below:

- Leadership
- Background
- Program structure
- Financial disclosure systems
- Ethics training
- Ethics counseling
- Enforcement

### **Program Elements**

This report consists of descriptions, analyses, and conclusions regarding each program element reviewed.

#### **LEADERSHIP**

Agency leadership commitment and action is the keystone for ensuring the integrity of an agency's ethical culture and for fostering public confidence in the decision-making processes of Government. Leadership support for the DOI ethics program appears to be strong. For example, early in his tenure the Secretary tasked the Designated Agency Ethics Official (DAEO) with developing a proposal for strengthening the ethics program throughout DOI. In addition, during the course of the review the Solicitor of DOI as well as the Acting Director of OSM took the time to meet with OGE to discuss the importance of ethics and their efforts to support the ethics program.

#### The Secretarial Order

In May 2009, the DAEO contacted OGE to request assistance in developing a proposal to the Secretary. OGE met with officials from DOI's Departmental Ethics Office (DO) and discussed with them, among other things,

- the benefits and drawbacks of centralized versus decentralized ethics programs;
- the use of technology to increase program efficiency;
- the program elements that all successful programs have, including elements that foster consistency, accountability, and transparency; and
- the need for leadership support for and involvement in the ethics program.

Subsequent to the meeting, OGE facilitated discussions between the DO and ethics officials from the Environmental Protection Agency, the Department of Health and Human Services, and the Department of Agriculture. These agencies were chosen based on a variety of factors including their use of technology in the administration of the ethics program and their geographic and organizational structure. Ethics officials from these agencies shared their innovations and successes, as well as some of their challenges, with the DO officials.

Based on these meetings, the DAEO and her staff drafted the proposal to the Secretary. The proposal outlined a comprehensive strategy to create a model ethics program. On August 31, 2009, the Secretary signed Order No. 3288, Enhancing and Promoting an Ethical Culture within the Department of the Interior (Order). The Order outlines specific ethics-related requirements for DOI employees, Bureau Heads, Assistant Secretaries, and the DAEO. These requirements will be discussed in detail throughout this report.

#### **BACKGROUND**

In advance of OGE's planned review, the DAEO and the Alternate Designated Agency Ethics Official (ADAEO) met with OGE to discuss their concerns about the ethics programs at

the Bureau level. Based on the findings of prior OGE program reviews as well as an outside ethics consultant, the DAEO and ADAEO believed that some Bureau ethics programs were not as structured as they should be and lacked formal policies, adequate staffing levels, and resources. As a result of the discussion with the DAEO and ADAEO as well as an examination of the OGE program review history of DOI Bureaus, OGE decided to review the ethics programs at OSM and OST.

#### PROGRAM STRUCTURE

DOI's ethics program is decentralized. Overall direction and support for the ethics program is provided by the DO, with the Director of the DO serving as the DAEO and the Deputy Director of the DO serving as the ADAEO. The DO provides direct ethics services to the Offices of the Secretary and the Solicitor. The DO also provides services to the Bureaus, as requested. During the course of the review the DAEO voiced a few concerns. One concern was the lack of an established chain of command throughout DOI for the DO to remain advised of the day-to-day administration of Bureau ethics programs. Another concern was that the DAEO did not have direct authority over the administration of those programs in terms of staffing and personnel. These concerns should be addressed by the Order, which requires that the DAEO will "maintain a general supervisory role in relation to the ethics program of the various Bureaus and offices with review and concurrence of hiring decisions by the Bureau Heads for Deputy Ethics Counselors (DEC)." These requirements went into effect August 31, 2009.

OGE's review identified model practices that the DO has implemented or is working to implement. For example, the DO holds monthly Agency Ethics Council (AEC) meetings open to DECs from the DO and all Bureaus nationwide. If a DEC cannot attend in person, he/she is encouraged to conference call in. The AEC meetings provide an opportunity for the DAEO to share important news and information, as well as allow DECs to share questions and concerns with other DECs throughout DOI. Meetings such as these promote consistency throughout the ethics program. The DO also encourages the inclusion of ethics duties in position descriptions and performance appraisals. This effort is noteworthy. OGE believes that including ethics duties in position descriptions and performance appraisals promotes accountability within the ethics program. Additional model practices to enhance the existing ethics program will be provided by a working group established by the Order. This working group will be comprised of senior career and non-career employees and convened by the DAEO.

During OGE's review, the DAEO indicated that in the future the DO will be restructured into four branches: a Departmental branch, which will serve the Offices of the Secretary and of the Solicitor; a Bureau branch, which will provide direct support to all of the Bureaus; a training and information technology branch, which will create and distribute new training as well as develop technology to better administer and maintain the DOI ethics program as a whole; and a program review branch, which will conduct periodic internal reviews of the ethics programs throughout DOI.

#### OSM

The day-to-day administration of the ethics program at OSM resides at the Bureau level and is based in the Division of Human Resources. All ethics-related duties, including advice and counseling services, financial disclosure review, and training for the approximately 530 OSM employees, are handled by one DEC. The DEC performs ethics as a collateral duty. He is also the security officer and human resources officer.

The OSM DEC indicated that the DO has been extremely supportive, but added that even with its assistance the ethics workload is almost unmanageable. The Order appears to address this issue, stating that Bureau Heads will "...employ a full-time Deputy Ethics Counselor properly classified at the GS-14 level or higher..." and "Provide the Deputy Ethics Counselors with adequate support staff as well as financial and technical resources to implement the ethics program."

#### OST

The day-to-day administration of the ethics program at OST resides at the Bureau level and is also based in the Division of Human Resources. The DEC position has been held by four employees over the past 2 years and is now vacant. The Human Resources supervisor is currently acting as the OST DEC. She performs ethics as a collateral duty in addition to her role as the Division of Human Resources supervisor.

#### FINANCIAL DISCLOSURE SYSTEMS

Title I of the Ethics in Government Act requires that agencies ensure confidence in the integrity of the Federal Government by demonstrating that officials are able to carry out their duties without compromising the public trust. High-level Federal officials demonstrate that they are able to carry out their duties without compromising the public trust by disclosing publicly their personal financial interests (SF 278). Title I also authorizes OGE to establish a confidential financial disclosure system for less senior executive branch personnel in certain designated positions to facilitate internal agency conflict of interest review (OGE Form 450). Financial disclosure serves to prevent conflicts of interest and to identify potential conflicts by providing for a systematic review of the financial interests of both current and prospective officers and employees. The financial disclosure reports also assist agencies in administering their ethics programs in providing counseling to employees. See 5 CFR § 2634.104(b).

#### <u>OSM</u>

OGE is concerned that the review of more than 500 financial disclosure reports—as well as the review of supplemental form DI-1993, required for all OSM employees because they have duties or responsibilities that fall under the Surface Mining Control and Reformation Act of 1977—is the responsibility of one DEC who performs ethics as a collateral duty. Going forward, this resource allocation may be addressed by the Order, which states that Bureau Heads will "...employ a full-time Deputy Ethics Counselor properly classified at the GS-14 level or

higher..." and "Provide the Deputy Ethics Counselors with adequate support staff as well as financial and technical resources to implement the ethics program."

However, OGE suggests that in the meantime OSM take other steps. For instance, ethics duties, such as the review of confidential financial disclosure reports, could be delegated to other staff of the Division of Human Resources in order to assist the OSM DEC. Additionally, all of OSM's employees are required to file a financial disclosure form. During discussions with OGE, neither the DEC nor the Division of Human Resources supervisor were able to answer why all OSM employees are required to file; both are relatively new to their positions and the practice was in place prior to their arrival. Therefore, OGE also suggests that OSM officials re-evaluate the determination to require all employees to file financial disclosure reports. To assist in the re-evaluation, OSM officials could refer to the filing criteria set forth in 5 CFR 2634.904 as guidance; OGE's job aid, *Determining Which Positions Should File A Confidential Financial Disclosure Report: A Worksheet*, posted in the Training Materials section of the OGE Web site; or consult with the DO and the OGE desk officer as appropriate.

Written comments on the reports and e-mail documentation included in the files indicated that the public financial disclosure reports underwent a thorough review by the OSM DEC. However, there was no documentation indicating why one report was certified in a protracted manner, almost 6 months after review, though reviewer notes did indicate that during a follow-up conversation the filer confirmed that there were no changes in the reported information between the dates of filing and certification. OGE could not determine whether the confidential financial disclosure reports underwent a thorough review because there were no reviewer notes or other documentation included with the reports. In addition, 15 of the 50 reports examined were filed late. However, OGE notes that these late files were in spite of action taken by the OSM DEC. For example, the OSM DEC provided the OGE Form 450 and instructions to covered employees well in advance of the filing deadline and sent numerous e-mails reminding covered employees of the requirement to file. Additionally, the OSM DEC sent at least 3 follow-up e-mails requesting the reports from employees who missed the filing deadline.

OGE's program review guidelines require that all or a judgmental sample of financial disclosure reports be reviewed during the on-site fieldwork to evaluate the filing, review, and certification of public reports. Because of the small number of public reports, OGE examined all eight public reports required to be filed by OSM employees in 2008. On the other hand, because of the number of confidential filers, OGE examined 50 of the approximately 520 confidential financial disclosure reports required to be filed by OSM employees in 2008. The following two tables provide a summary of OGE's examination of the public and confidential financial disclosure reports sampled as part of this review

Table 1
OSM Public Financial Disclosure Reports

Report Type	Number in	Filed Late	Reviewed	Protracted
	Sample		Late	Certification
Incumbent	5	0	0	0
New Entrant	1	0	0	0
Termination	2	0	0	1
Total in Category	8	0	0	1

Table 2
OSM Confidential Financial Disclosure Reports

Report Type	Number in Sample	Filed Late	Reviewed Late	Protracted Certification
Incumbent	18	6	0	0
Incumbent (450-A)	29	9	0	0
New Entrant	3	0	0	0
Termination	0	0	0	0
Total In Category	50	15	0	0

#### **OST**

The OST DEC indicated that financial disclosure review is no longer conducted in the OST Division of Human Resources. Instead, the approximately 260 financial disclosure reports are collected at OST, then the public reports are sent to DOI's Minerals Management Service (MMS) ethics office for review and certification, while the confidential reports are sent to the DO for review and certification. OGE is concerned that there is a need to forward the reports to other offices for review and certification because it is unclear how familiar outside officials are with the specific duties of OST employees. Without this knowledge it could be difficult to conduct an accurate conflict of interest analysis. Additionally, the OST DEC indicated that the current master list of filers may be inaccurate. The OST DEC was also unable to determine the actual number of individuals required to file a confidential financial disclosure report.

During OGE's discussions with the OST DEC it appeared that the current issues in the program were inherited. There has been a lot of turnover in the DEC position in the past few years, and the OST DEC is performing ethics as a collateral duty. She stated that the program has been run on an "ad hoc" basis and she has not been able to locate a number of ethics-related files. The Order appears to address the root of the issues in OST's program, stating that Bureau Heads will "...employ a full-time Deputy Ethics Counselor properly classified at the GS-14 level

or higher..." and "Provide the Deputy Ethics Counselors with adequate support staff as well as financial and technical resources to implement the ethics program." However, OGE suggests that in the meantime OST take other steps. For instance, ethics duties, such as the review of confidential financial disclosure reports, could be delegated to other staff of the Division of Human Resources in order to assist the OST DEC. OGE also suggests that OST officials ensure the accuracy of the master list of filers as soon as possible.

Written comments on the reports indicated that the public financial disclosure reports underwent a thorough review by the MMS DEC. Reviewer notes indicated that the late review—and protracted certification almost 7 months after the review—of one report was due to the filer's "hectic work and travel schedule and the complexity of the report" severely delaying resolutions to outstanding issues. Written comments and documentation in files indicated that the confidential financial disclosure reports underwent a thorough review by DO officials. However, there was no documentation in the files indicating why 8 reports were certified almost 6 months after they were filed.

OGE's program review guidelines require that all or a judgmental sample of financial disclosure reports be reviewed during the on-site fieldwork to evaluate the filing, review, and certification of public reports. Because of the small number of public reports, OGE examined all 10 public reports required to be filed by OST employees in 2008. On the other hand, because of the number of confidential filers, OGE examined 21 of the approximately 250 confidential reports required to be filed by OST employees in 2008. Tables 3 and 4 provide a summary of OGE's examination of the public and confidential financial disclosure reports sampled as part of this review.

<u>Table 3</u> OST Public Financial Disclosure Reports

Report Type	Number in	Filed Late	Reviewed	Protracted
	Sample		Late	Certification
Incumbent	10	0	1	1
New Entrant	0	0	0	0
Termination	0	0	0	0
Total	10	0	1	1
In Category				

Table 4
OST Confidential Financial Disclosure Reports

Report Type	Number in Sample	Filed Late	Reviewed Late	Protracted Certification
Incumbent	13	1	8	8
Incumbent (450-A)	5	0	0	0
New Entrant	3	0	3	3
Termination	0	0	0	0
Total in Category	21	1	11	11

#### ETHICS TRAINING

An ethics education and training program is essential to raising awareness among employees about ethics laws and rules and informing them that an agency ethics official is available to provide ethics counseling. Each agency's ethics training program must include at least an initial ethics orientation for all employees and annual ethics training for covered employees.

OGE's review identified a number of training-related model practices that the DO has implemented or is working to implement. OGE noted ethics-related posters displayed throughout DOI in highly traveled locations such as in front of the cafeteria. This practice promotes awareness of the ethics program among employees. In addition, the DO is developing targeted training for supervisors, developing Bureau-specific training, and working with the DOI Information Technology Department to display OGE "splash screens" when employees logon to their computers.

#### **Initial Ethics Orientation**

Within 90 days from the time an employee begins work for an agency, the agency must provide all employees with initial ethics orientation. Initial ethics orientation must include the following:

- the Standards of Ethical Conduct for Employees of the Executive Branch (Standards) and any agency supplemental standards;
- the names, titles, office addresses, and phone numbers of the DAEO and other ethics officials; and
- at least one hour of official duty time to review the items described above. See 5 CFR § 2638.703.

#### **OSM**

OSM appears to have met the initial ethics orientation requirements. Within 90 days from the time an employee begins work at OSM, the employee is provided with a pocket-size booklet titled *Ethics Guide for Department of Interior Employees*. This booklet contains a "plain English" version of the Standards, DOI's supplemental standards, the contact information for the DO, and contact information for OSM's DEC. At least 1 hour of official duty time is provided to review the materials. According to the OSM DEC, all new employees received initial ethics orientation in 2008.

#### <u>OST</u>

OST appears to have met most of the initial ethics orientation requirements. Within 90 days from the time an employee begins work at OST, the employee is provided with a pocket-size booklet titled *Ethics Guide for Department of Interior Employees*. This booklet contains a "plain English" version of the Standards, DOI's supplemental standards, the contact information for the DO, and contact information for OST's DEC. At least 1 hour of official duty time is provided to review the materials. However, due to a lack of appropriate records, the OST DEC was not able to confirm that all new employees received initial ethics orientation in 2008.

### **Annual Ethics Training**

Public financial disclosure filers are required to receive verbal annual ethics training each year. See 5 CFR § 2638.704(a). Verbal training includes training prepared by a qualified instructor and presented by telecommunications, computer, audiotape, or videotape. See 5 CFR § 2638.704(c)(2). Other covered employees (e.g., confidential filers) are required to receive verbal annual ethics training at least once every 3 years and may receive written annual training in the intervening years. See 5 CFR § 2638.705(c). The content requirements for both public filers and other covered employees are the same. Agencies are encouraged to vary the content of annual training from year to year but the training must include, at least, a review of the following items:

- the 14 Principles of Ethical Conduct;
- the Standards;
- any agency supplemental standards;
- the Federal conflict of interest statutes; and
- the names, titles, office addresses, and phone numbers of the DAEO and other ethics officials. *See* 5 CFR § 2638.704(b).

#### <u>OSM</u>

All OSM employees are required to receive annual ethics training. Most OSM employees satisfied the requirement by viewing a satellite presentation conducted by the DO. Employees who did not view the satellite presentation were instructed to review the *Ethics Guide for Department of the Interior Employees* for an hour or complete an OGE ethics crossword puzzle. OGE informed the OSM DEC that completing an OGE ethics crossword puzzle does not

fulfill the annual training requirement. The OSM DEC indicated that no OSM employees chose that option in 2008, but he would not provide it as an option in the future.

OSM employees certified via e-mail that they reviewed the materials. OGE's review of the materials found they met the annual ethics training content requirements. According to the OSM DEC, all OSM employees received annual ethics training in 2008.

#### OST

Since the OST DEC was unable to determine the actual number of individuals required to file a confidential financial disclosure report, the OST DEC was also unable to determine how many OST employees are required to receive annual ethics training. Therefore, the OST DEC was not able to verify that all covered employees received annual ethics training in 2008. However, those thought to be covered employees were instructed to review the *Ethics Guide for Department of the Interior Employees* and were provided a certification document to sign and return to the OST DEC. The OST DEC provided OGE with a Powerpoint titled *Values in Ethics* that employees were also instructed to review. OGE's review of the materials found they met the annual ethics training content requirements. OGE suggests that OST officials determine the actual number of individuals required to receive annual ethics training as soon as possible.

#### ETHICS COUNSELING

The DAEO is required to ensure that a counseling program for agency employees concerning ethics and standards of conduct matters, including post-employment matters, is developed and conducted. *See* 5 CFR § 2638.203. The DAEO may delegate to one or more deputy ethics officials the responsibility for developing and conducting the counseling program. *See* 5 CFR § 2638.204. The DOI grants Bureau DECs the authority to provide counseling services.

OGE's assessment of an ethics counseling program focuses on five factors: (1) accuracy, (2) timeliness, (3) transparency, (4) accountability, and (5) consistency. To determine whether an agency's counseling program successfully addresses these factors, OGE reviews and assesses the program's processes and written procedures. Due to the limited number of pieces of counseling provided by the OSM and OST DECs, OGE was unable to make a determination regarding whether the counseling services at OSM and OST are successfully meeting the above factors. The counseling programs at both OSM and OST should be considered areas needing attention and evaluation during the implementation of the Order.

#### OSM

OGE reviewed all three pieces of counseling provided by the OSM DEC. The OGE desk officer indicated that all three documents provided what appeared to be complete and accurate counseling, but the original questions were not included so it was difficult to determine the sufficiency of the response. The OSM DEC provided other documents, but the OGE desk officer categorized these as general guidance documents. Due to the limited number of pieces of

counseling provided by the OSM DEC, OGE's desk officer could not provide a complete analysis of the counseling services provided by OSM.

#### OST

OGE reviewed all five pieces of counseling provided by the OST DEC. The OGE desk officer indicated that four of the pieces of counseling were issued at least 3 years ago, and were provided by the DO ethics office and not the OST DEC. All five pieces of counseling were complete and accurate. The OST DEC also provided another document, but the OGE desk officer categorized it as a general guidance document. Due to the limited number of pieces of counseling provided by the OST DEC, OGE's desk officer could not provide a complete analysis of the counseling services provided by OST.

#### **ENFORCEMENT**

The DAEO is required to ensure that (1) information developed by internal audit and review staff, the Office of the Inspector General (OIG), or other audit groups is reviewed to determine whether such information discloses a need for revising agency standards of conduct or for taking prompt corrective action to remedy actual or potential conflict of interest situations and (2) the services of the agency's OIG are utilized when appropriate, including the referral of matters to and acceptance of matters from that Office. See 5 CFR § 2638.203(b)(11) and (12).

DOI's Acting Inspector General stated that her office is responsible for making referrals to DOJ and conducting investigations of alleged ethics violations. The DO is responsible for concurrently notifying OGE of any referrals to DOJ. The Acting Inspector General and her Chief of Staff explained to the OGE review team that there is an effective working relationship between the OIG and the DO. The Acting Inspector General told the OGE review team that there are open lines of communication between both offices and relevant information is shared.

#### **OSM**

According to the OSM DEC, there were no potential violations of the criminal conflict of interest statutes referred to the Department of Justice (DOJ) in 2008. There were also no disciplinary actions taken based on violations of the Standards during that time.

#### OST

According to the OST DEC, there was one potential violation of the criminal conflict of interest statutes referred to DOJ in 2008. The case referred involved two Senior Executive Service (SES) employees who had inappropriate interactions with contractors providing services to OST. One of the SES employees has resigned from Federal service and the other has proposed receiving administrative action.

#### **Summary**

OGE determined that the ethics program at OSM appears to meet minimum regulatory compliance. However, certain issues related to the financial disclosure and advice and counseling program elements should be addressed. OGE could not determine whether the ethics program at OST meets minimum regulatory compliance because (1) OST could not confirm the accuracy of the master list of filers or the number of employees required to receive annual training and (2) due to the limited number of pieces of counseling provided by OST, OGE was unable to perform a comprehensive analysis of OST's counseling services. Implementation of the Order will likely address the issues in both programs. While OGE has not made any formal recommendations, the report does include suggestions for improvement.

OGE also reviewed some elements of the DOI Departmental Ethics Office (DO). Because of the limited scope of the review at the DO, OGE did not make a compliance determination. OGE did not two model practices that the DO has implemented:

- holding monthly Agency Ethics Council meetings and
- displaying ethics-related posters around DOI.

#### **Suggestions**

To enhance the ethics programs at OSM and OST, OGE suggests the following actions:

- OSM and OST consider delegating ethics responsibilities to other staff
- OSM should re-evaluate the determination to require all employees to file financial disclosure reports
- OST officials ensure the accuracy of the master list of filers.

OGE will follow-up with OST before the next filing cycle to confirm that the master list of filers is accurate. OGE will also follow-up with the DO in 60 days to see what progress has been made in implementing Secretarial Order No. 3288, Enhancing and Promoting an Ethical Culture within the Department of the Interior.

#### **Agency Comments**

A draft of this report was provided to DOI ethics officials for comment. No substantive comments were received.

If you would like to discuss this report, please contact Trish Zemple, Associate Director for Program Reviews, at 202-482-9286.