

May 3, 2007

MEMORANDUM FOR: Vonna L. Ordaz  
Assistant for Operations  
Office of the Executive Director for Operations

FROM: Stephen D. Dingbaum/**RAI**  
Assistant Inspector General for Audits  
Office of the Inspector General

SUBJECT: STATUS OF OPEN AUDIT RECOMMENDATIONS –  
April 2007

Attached is the OIG up-to-date status of all open audit recommendations as of the end of April 2007. Should you have any questions please feel free to contact Tony Lipuma at 301-415-5910.

Attachment: As stated

cc: M. Malloy, OEDO  
P. Tressler, OEDO

## Status of Audit Recommendations - Open Audits

Report Number & Title	Unresolved	Resolved	Closed	Total
OIG-00-E-09 Special Evaluation of the Role and Structure of NRC's Executive	0	2	0	2
OIG-01-A-03 Government Performance and Results Act: Review of the Fiscal	0	2	0	2
OIG-02-A-12 Review of ADAMS	0	1	0	1
OIG-03-A-01 Review of NRC's Handling and Marking of Sensitive Unclassifie	0	2	0	2
OIG-03-A-11 Use of E-Mail at NRC	0	1	0	1
OIG-03-A-15 Audit of NRC's Regulatory Oversight of Special Nuclear Materia	0	3	5	8
OIG-04-A-11 Review of NRC's Personnel Security Program	0	1	11	12
OIG-04-A-15 Review of NRC's Drug-Free Workplace Plan	0	3	0	3
OIG-04-A-20 Audit of NRC's Incident Response Program	0	9	8	17
OIG-04-A-21 System Evaluation of the Agencywide Documents Access and M	0	5	1	6
OIG-04-A-22 Independent Evaluation of NRC's Implementation of the Federal	0	5	11	16
OIG-04-A-23 System Evaluation of the FEE Systems	0	1	5	6
OIG-04-A-24 Systems Evlaluation of the GeneralLicense Tracking System	0	3	2	5
OIG-05-A-05 Audit of NRC's Drug Testing Program	0	3	9	12
OIG-05-A-08 System Evaluation of the Integrated Personnel Security System (I	0	7	1	8
OIG-05-A-09 Audit of the Budget Formulation Process	0	3	1	4
OIG-05-A-13 Audit of NRC's Telecommunications Program	0	4	9	13
OIG-05-A-14 System Evaluation of Listed Systems that Process Safeguards and	0	5	5	10
OIG-05-A-17 Audit of NRC's Decommissioning Program	0	1	3	4
OIG-05-A-18 Security Controls Over Personal Computers and Laptops - FISML	0	8	0	8
OIG-05-A-19 Audit of NRC's Generic Communications Program	0	3	1	4
OIG-05-A-20 Evaluation of NRC's Certification and Accreditation Efforts	0	1	1	2
OIG-05-A-21 Independent Evaluation of NRC's Implementation of the Federal	0	9	1	10
OIG-05-A-22 Evaluation of NRC's Automated Information System Inventory P	0	3	4	7
OIG-06-A-06 Audit of NRC's Integrated Personnel Security System	0	4	13	17
OIG-06-A-09 Audit of NRC's Office of Nuclear Security and Incident Respons	0	6	0	6
OIG-06-A-10 Audit of the Development of the National Source Tracking Syste	1	0	1	2
OIG-06-A-11 Audit of the NRC Byproduct materials License Application and I	2	0	0	2
OIG-06-A-12 Audit of NRC's Oversight of Agreement States' Licensing Action	0	1	1	2
OIG-06-A-13 MEMORANDUM REPORT: AUDIT OF NMSS' PROCEDUR	0	2	0	2
OIG-06-A-14 Evaluation of personal Privacy Information Found on NRC Netw	0	3	1	4
OIG-06-A-20 Audit of NRC's Implementation of Homeland Security Presidenti	0	1	5	6
OIG-06-A-21 Audit of NRC's Baseline Security and Safeguards Inspection Pro	0	6	2	8
OIG-06-A-22 Audit of NRC's Process for Releasing Commission Decision Doc	1	1	0	2
OIG-06-A-24 Evaluation of NRC's Use of Probabilistic Risk Assessment In Re	3	0	0	3
OIG-06-A-26 Independent Evaluation of NRC's Implementation of FISMA for	0	3	0	3
OIG-07-A-02 Audit of NRC's FY 2006 Financial Statements	0	5	0	5
OIG-07-A-04 Social Engineering Assessment	0	5	5	10
OIG-07-A-05 Audit of NRC's Technical Training Center	0	10	1	11
OIG-07-A-06 Audit of NRC's Regulation of Nuclear Fuel Cycle Facilities	0	1	0	1
OIG-07-A-10 Audit of NRC's Badge Access System	17	0	0	17
OIG-07-A-11 Memorandum Report: Audit of NRC's Nuclear Material Events ]	0	3	0	3
OIG-99-A-01 NRC'S License Fee Development Process Needs Improvement	0	2	0	2
<b>Grand Total</b>	<b>24</b>	<b>138</b>	<b>107</b>	<b>269</b>

## Status of OIG Audit Recommendations

Rec #	Description	Responsible Office	OIG Correspondence	Agency Response Due	Agency Response Received	Status
<b>☐ OIG-00-E-09 Special Evaluation of the Role and Structure of NRC's Executive Council (08/31/2000)</b>						
1	Update NRC's Management Directives	EDO			02/27/2007	Resolved
2	Communication - CIO and CFO	EDO			02/27/2007	Resolved
<b>☐ OIG-01-A-03 Government Performance and Results Act: Review of the Fiscal Year 1999 Performance Report (02/23/2001)</b>						
1	Develop a Management Directive	OCFO	12/26/2006	06/29/2007		Resolved
3	Include guidance on reporting unmet goals	OCFO	12/26/2006	06/29/2007		Resolved
<b>☐ OIG-02-A-12 Review of ADAMS (06/12/2002)</b>						
1	Finalize and issue MD 2.5	EDO	03/15/2007	06/01/2007		Resolved
<b>☐ OIG-03-A-01 Review of NRC's Handling and Marking of Sensitive Unclassified Information (10/16/2002)</b>						
1	Update OOU Guidance	EDO	12/26/2006	11/03/2008		Resolved
2	Mandate defined markings	EDO				Resolved
<b>☐ OIG-03-A-11 Use of E-Mail at NRC (03/21/2003)</b>						
1	Revise MD 3.53	EDO,OIS	04/20/2006	10/13/2006		Resolved
<b>☐ OIG-03-A-15 Audit of NRC's Regulatory Oversight of Special Nuclear Materials (05/23/2003)</b>						
1	Conduct periodic inspections	EDO,NMSS	11/20/2006	12/31/2007		Resolved
3	Document risk informed approach	EDO,NMSS	11/20/2006	12/31/2007		Resolved
4	Require annual inventories	EDO,NMSS	11/20/2006	12/31/2007		Resolved
<b>☐ OIG-04-A-11 Review of NRC's Personnel Security Program (03/25/2004)</b>						
12	Cancel OPM investigations when intern terminates.	ADM	03/14/2006	01/02/2007		Resolved
<b>☐ OIG-04-A-15 Review of NRC's Drug-Free Workplace Plan (05/24/2004)</b>						
1	Revise Plan to Include Deferral of Testing Clause	ADM,HR			04/27/2007	Resolved
2	Obtain HHS Approval of Drug-Free Workplace Plan Prior to Implementation	ADM,HR			04/27/2007	Resolved
3	Drug-Testing Plan Revisions Must Receive Approval from HHS	ADM,HR			04/27/2007	Resolved
<b>☐ OIG-04-A-20 Audit of NRC's Incident Response Program (09/16/2004)</b>						
1	Establish agency IRP with Performance Standards & Evaluation Mechanism	NSIR	11/22/2006	06/30/2007		Resolved
3	Update NUREG 0845	NSIR	11/22/2006	06/30/2007		Resolved
4	Conduct Periodic Reviews of Region's IRPs	NSIR	11/22/2006	06/30/2007		Resolved
8	Conduct Exercises Involving Multiple Sites	NSIR	11/22/2006	06/30/2007		Resolved
11	Revise IRP to Address Incidents Involving Materials/Fuel Cycle Facilities	NSIR	11/22/2006	06/30/2007		Resolved
13	Update Response Technical Manual for GDPs	NSIR	11/22/2007	06/30/2007		Resolved
14	Improve IRP Outreach with Licensees	NSIR	11/22/2006	06/30/2007		Resolved
16	Develop & Implement Well-defined Training Program	NSIR	11/22/2006	06/30/2006		Resolved
17	Establish a centralized tracking system for IRO training	NSIR	11/22/2006	06/30/2007		Resolved
<b>☐ OIG-04-A-21 System Evaluation of the Agencywide Documents Access and Management System (09/30/2004)</b>						
1	Update the ADAMS Risk Assessment Report	OCIO	11/20/2006	06/29/2007		Resolved
2	Update the ADAMS Security Plan	OCIO	11/20/2006	06/29/2007		Resolved
4	Update the ADAMS Business Continuity Plan	OCIO	11/20/2006	06/29/2007		Resolved
5	Consistently define the protection requirements	OCIO	11/20/2006	06/29/2007		Resolved
6	Track all actions items resulting from testing of the ADAMS security controls	OCIO	11/20/2006	06/29/2007		Resolved
<b>☐ OIG-04-A-22 Independent Evaluation of NRC's Implementation of the Federal Information Security Management Act (FISMA) for Fiscal Year 2004 (09/30/2004)</b>						

## Status of OIG Audit Recommendations

Rec #	Description	Responsible Office	OIG Correspondence	Agency Response Due	Agency Response Received	Status
5	Re-certify and re-accredit the NRC Data Center/Telecommunications System.	OCIO			04/04/2007	Resolved
6	Re-certify and re-accredit the NRC Local Area Network/Wide Area Network	OCIO			04/04/2007	Resolved
7	Re-certify and re-accredit the Emergency Response Data System.	OCIO			04/04/2007	Resolved
8	Re-certify and re-accredit the Emergency Telecommunications System	OCIO			04/04/2007	Resolved
10	Update the NRC LAN/WAN Business Continuity Plan.	OCIO			04/04/2007	Resolved
<b>☐ OIG-04-A-23 System Evaluation of the FEE Systems (09/30/2004)</b>						
4	Update the Fee Systems Business Continuity Plan	OCFO	04/02/2007	08/15/2007		Resolved
<b>☐ OIG-04-A-24 Systems Evaluation of the General License Tracking System (09/30/2004)</b>						
1	Update the GLTS Security Plan	NMSS,OCIO			03/29/2007	Resolved
3	Update the GLTS Business Continuity Plan	NMSS,OCIO			03/29/2007	Resolved
4	Update the GLTS Security Plan	NMSS,OCIO			03/29/2007	Resolved
<b>☐ OIG-05-A-05 Audit of NRC's Drug Testing Program (12/20/2004)</b>						
4	Revise categories of testing designated positions	ADM	12/26/2006	03/31/2007		Resolved
5	Re-evaluate categories of testing designated positions	ADM	12/26/2006	03/31/2007		Resolved
12	Update the Management Directive System to include drug testing policy	ADM	12/26/2006	03/31/2007		Resolved
<b>☐ OIG-05-A-08 System Evaluation of the Integrated Personnel Security System (IPSS) (01/14/2005)</b>						
1	Re-certify and re-accredit IPSS	ADM	08/29/2006	06/22/2007		Resolved
2	Update risk assessment risk levels	ADM	09/05/2006	06/22/2007		Resolved
3	Update plan contact info	ADM	09/05/2006	06/22/2007		Resolved
4	Update plan life cycle & IRO capability.	ADM	09/05/2006	06/22/2007		Resolved
5	Update plan control descriptions.	ADM	09/05/2006	06/22/2007		Resolved
7	Update contingency plan	ADM	09/05/2006	06/22/2007		Resolved
8	Consistently define plan and assessment protection requirements	ADM	09/05/2006	06/22/2007		Resolved
<b>☐ OIG-05-A-09 Audit of the Budget Formulation Process (01/31/2005)</b>						
1	EDO, CFO Roles	OCFO	11/06/2007	06/29/2007		Resolved
2	PRC Role	OCFO	11/06/2006	06/29/2007		Resolved
3	Document Process	OCFO	11/06/2006	06/29/2007		Resolved
<b>☐ OIG-05-A-13 Audit of NRC's Telecommunications Program (06/07/2005)</b>						
1	Purchase and implement billing review software.	OCIO	04/11/2007	08/31/2007		Resolved
2	Establish benchmarks.	OCIO	04/11/2007	08/31/2007		Resolved
3	Revise MD 2.3.	OCIO	04/11/2007	08/31/2007		Resolved
4	Establish telephone line and circuit inventory requirements.	OCIO	04/11/2007	08/31/2007		Resolved
<b>☐ OIG-05-A-14 System Evaluation of Listed Systems that Process Safeguards and/or Classified Information (08/11/2005)</b>						
1	Correct the inaccuracies	NSIR,OIS			04/16/2007	Resolved
2	Validate the inventory	NSIR,OIS			04/16/2007	Resolved
5	Develop procedures approved security plan	NSIR,OIS			04/16/2007	Resolved
6	Develop procedures for owners respond to OIS requests	NSIR,OIS			04/16/2007	Resolved
7	Develop procedures for verifying all required security controls	NSIR,OIS			04/16/2007	Resolved
<b>☐ OIG-05-A-17 Audit of NRC's Decommissioning Program (09/21/2005)</b>						
1	Retain Supporting Documentation	NMSS,OCFO	11/06/2006	06/29/2007		Resolved

## Status of OIG Audit Recommendations

Rec #	Description	Responsible Office	OIG Correspondence	Agency Response Due	Agency Response Received	Status
<b>☐ OIG-05-A-18 Security Controls Over Personal Computers and Laptops - FISMA (09/22/2005)</b>						
1	Security controls on laptops	OIS	11/14/2006	04/01/2007		Resolved
2	Rules of behavior agreement for security controls	OIS	11/14/2006	04/01/2007		Resolved
3	Verify required security controls	OIS	11/14/2006	04/01/2007		Resolved
4	Provide guidance on Executive Order 13103	OIS	11/14/2006	04/01/2007		Resolved
5	Rules of behavior agreement EO 13103	OIS	11/14/2006	04/01/2007		Resolved
6	Develop procedures for monitoring compliance with Executive Order 13103	OIS	11/14/2006	04/01/2007		Resolved
7	Develop procedures in the Management Directives for disposal of equipment	OIS	11/14/2006	04/01/2007		Resolved
8	Include procedures for disposal of equipment in security plan.	OIS	11/14/2006	04/01/2007		Resolved
<b>☐ OIG-05-A-19 Audit of NRC's Generic Communications Program (09/30/2005)</b>						
1	Security Advisories in GC Program	NRR,NSIR	04/19/2007	07/31/2007		Resolved
3	Consistent Tracking Methodology	NRR,NSIR	04/19/2007	07/31/2007		Resolved
4	Effectiveness of GC Program	NRR	04/19/2007	07/31/2007		Resolved
<b>☐ OIG-05-A-20 Evaluation of NRC's Certification and Accreditation Efforts (09/30/2005)</b>						
1	Develop and implement procedures for monitoring C&As	OIS	04/25/2007	08/30/2007		Resolved
<b>☐ OIG-05-A-21 Independent Evaluation of NRC's Implementation of the Federal Information Security Management Act (FISMA) for Fiscal Year 2005 (09/30/2005)</b>						
1	Categorize all NRC information systems	OIS	12/26/2006	07/31/2007		Resolved
3	Contingency Plan Test Procedures	OIS	12/26/2006	07/31/2007		Resolved
4	Maintain other agency C&As.	OIS	12/26/2006	07/31/2007		Resolved
5	Maintain other agency's self-assessments.	OIS	12/26/2006	07/31/2007		Resolved
6	Maintain annual contingency plan test results other agencies.	OIS	12/26/2006	07/31/2007		Resolved
7	Procedures for contractor oversight	OIS	12/26/2006	07/31/2007		Resolved
8	Review and update the six completed e-authentication risk assessments.	OIS	12/19/2006	07/31/2007		Resolved
9	Develop and implement plan for completing e-authentication risk assessments.	OIS	12/26/2006	07/31/2007		Resolved
10	Develop and implement procedures for security awareness and training.	OIS	12/26/2006	07/31/2007		Resolved
<b>☐ OIG-05-A-22 Evaluation of NRC's Automated Information System Inventory Process (09/30/2005)</b>						
2	Validate information in the AIS inventories annually.	OIS	03/15/2007	06/14/2007		Resolved
3	Provide guidance to office directors, regional administrators, and system owners/sponsors	OIS			03/10/2007	Resolved
6	Develop procedures for recording system information for multiple components	OIS	03/15/2007	06/14/2007		Resolved
<b>☐ OIG-06-A-06 Audit of NRC's Integrated Personnel Security System (01/09/2006)</b>						
4	IPSS reinvestigation data clean-up	ADM	02/26/2007	08/01/2007		Resolved
7	Top-to-bottom cleanup of IPSS data	ADM	04/11/2007	08/01/2007		Resolved
14	IPSS audit trail reports	ADM	04/11/2007	08/01/2007		Resolved
17	Cost-benefit analysis	ADM	04/11/2007	08/01/2007		Resolved
<b>☐ OIG-06-A-09 Audit of NRC's Office of Nuclear Security and Incident Response (02/16/2006)</b>						
1	Prioritizing Assignments	EDO,NSIR	12/26/2006	05/31/2007		Resolved
2	Documenting Emergent Work	EDO,NSIR	12/26/2006	05/31/2007		Resolved
3	Emergent Work Log	EDO,NSIR	12/26/2006	05/31/2007		Resolved
4	Communication Policies and Procedures	EDO,NSIR	12/26/2006	05/31/2007		Resolved
5	Measure Communication Effectiveness	EDO,NSIR	12/26/2006	05/31/2007		Resolved

## Status of OIG Audit Recommendations

Rec #	Description	Responsible Office	OIG Correspondence	Agency Response Due	Agency Response Received	Status
6	Assessment Follow-Up	EDO,NSIR	12/26/2006	05/31/2007		Resolved
<b>☐ OIG-06-A-10 Audit of the Development of the National Source Tracking System (02/23/2006)</b>						
1	1. Conduct Regulatory Analysis	NMSS	04/25/2007	09/03/2007		Unresolved
<b>☐ OIG-06-A-11 Audit of the NRC Byproduct materials License Application and Review Process (03/10/2006)</b>						
1	Conduct a materials process vulnerability assessment	EDO,NMSS			12/08/2006	Unresolved
2	Modify licensing process to address identified risks	EDO,NMSS			12/08/2006	Unresolved
<b>☐ OIG-06-A-12 Audit of NRC's Oversight of Agreement States' Licensing Actions (04/14/2006)</b>						
2	Document the rationale and basis for sampling methodology	STP	11/22/2006	07/15/2007		Resolved
<b>☐ OIG-06-A-13 MEMORANDUM REPORT: AUDIT OF NMSS' PROCEDURES FOR PROCESSING INSPECTION GUIDANCE (06/23/2006)</b>						
1	Revise P&PL 1-76	NMSS	08/15/2006	01/31/2007		Resolved
2	NMSS/NRR Formal Agreement	NMSS	08/15/2006	01/31/2007		Resolved
<b>☐ OIG-06-A-14 Evaluation of personal Privacy Information Found on NRC Network Drives (06/30/2006)</b>						
2	2. Remind employees files may be viewed	OIS			12/20/2006	Resolved
3	3. Develop policies reviewing drives	OIS			12/20/2006	Resolved
4	4. Conduct review and remove privacy information	OIS			12/20/2006	Resolved
<b>☐ OIG-06-A-20 Audit of NRC's Implementation of Homeland Security Presidential Directive -12 (08/01/2006)</b>						
6	Develop an HSPD-12 charter.	ADM	04/26/2007	07/02/2007		Resolved
<b>☐ OIG-06-A-21 Audit of NRC's Baseline Security and Safeguards Inspection Program (09/08/2006)</b>						
1	Required Training	NSIR			04/27/2007	Resolved
3	Security Oversight Responsibilities	NSIR			04/27/2007	Resolved
4	Training Program Update	NSIR			04/27/2007	Resolved
6	Sample Size Guidance	NSIR			04/27/2007	Resolved
7	Sample Size Training	NSIR			04/27/2007	Resolved
8	Security Findings Database	NSIR			04/27/2007	Resolved
<b>☐ OIG-06-A-22 Audit of NRC's Process for Releasing Commission Decision Documents (09/08/2006)</b>						
1	Develop a FOIA 552(a)(2) compliance program	EDO,OGC,SECY			03/15/2007	Resolved
2	Review unpublished SECY papers and SRMs for disclosure	EDO,OGC,SECY			03/15/2007	Unresolved
<b>☐ OIG-06-A-24 Evaluation of NRC's Use of Probabilistic Risk Assessment In Regulating the Commercial Nuclear Power Industry (09/29/2006)</b>						
1	Implement process for maintaining PRA models	NRR,RES			04/25/2007	Unresolved
2	PRA software (SAPHIRE/GEM) configuration control process	NRR,RES			04/25/2007	Unresolved
3	Full V&V for SAPHIRE and GEM	NRR,RES			04/25/2007	Unresolved
<b>☐ OIG-06-A-26 Independent Evaluation of NRC's Implementation of FISMA for FY 2006 (09/29/2006)</b>						
2	2. Re-categorize Network Continuity of Operations System	OIS			04/04/2007	Resolved
3	3. Re-evaluate the procedures developed for identifying POA&M weaknesses	OIS			04/04/2007	Resolved
<b>☐ OIG-07-A-02 Audit of NRC's FY 2006 Financial Statements (11/09/2006)</b>						
1	Rec. 01 - Assessment of Fee Billing System	OCFO	12/06/2006	11/15/2007		Resolved
2	Rec. 02 - Implement Compensating Controls	OCFO	12/06/2006	11/15/2007		Resolved
3	Rec. 03 - Coordinate and Collaborate with EDO	OCFO	12/06/2006	11/15/2007		Resolved
4	Rec. 04 - Coordinate with OIS and EDO	OCFO	12/06/2006	11/15/2007		Resolved
5	Rec. 05 - Implement the results of assessment strategy	OCFO	03/15/2007	07/31/2007		Resolved

## Status of OIG Audit Recommendations

Rec #	Description	Responsible Office	OIG Correspondence	Agency Response Due	Agency Response Received	Status
<b>☐ OIG-07-A-04 Social Engineering Assessment (11/30/2006)</b>						
2	Random password	OIS			03/29/2007	Resolved
5	attack profiles	OIS			03/29/2007	Resolved
7	Strict controls	OIS			03/29/2007	Resolved
8	restrict access to NRC networks	OIS			03/29/2007	Resolved
10	Verify identification	OIS			03/29/2007	Resolved
<b>☐ OIG-07-A-05 Audit of NRC's Technical Training Center (01/09/2007)</b>						
1	Rec. 01 - Revise MD 13.1	HR	03/15/2007	07/31/2007		Resolved
2	Rec. 02 - Issue Interim Guidance	HR			03/15/2007	Resolved
3	Rec. 03 - Finalize Policies and Procedures	HR	03/15/2007	07/31/2007		Resolved
4	Rec. 04 Maintenance Policy	HR	03/15/2007	07/31/2007		Resolved
5	Rec. 05 Policy for Pending Changes	HR	03/15/2007	07/31/2007		Resolved
6	Rec. 06 Develop Policy - Technical Currency	HR	03/15/2007	07/31/2007		Resolved
7	Rec. 07 Provide Instructional Methodology Training	HR	03/15/2007	07/31/2007		Resolved
9	Rec. 09 Periodically rotate cognizant instructors	HR	03/15/2007	07/31/2007		Resolved
10	Rec. 10 Establish method to track course evaluations	HR	03/15/2007	07/31/2007		Resolved
11	Rec. 11 Evaluation of Instructor performance	HR	03/15/2007	07/31/2007		Resolved
<b>☐ OIG-07-A-06 Audit of NRC's Regulation of Nuclear Fuel Cycle Facilities (01/10/2007)</b>						
1	Fuel Cycle Facility framework	NMSS	02/27/2007	06/11/2007		Resolved
<b>☐ OIG-07-A-11 Memorandum Report: Audit of NRC's Nuclear Material Events Database (03/23/2007)</b>						
1	Develop/implement FCNMED procedures	NMSS	04/25/2007	11/30/2007		Resolved
2	Appoint FCNMED coordinator	NMSS	04/25/2007	11/30/2007		Resolved
3	Conduct QA review of FCNMED	NMSS	04/25/2007	11/30/2007		Resolved
<b>☐ OIG-99-A-01 NRC'S License Fee Development Process Needs Improvement (12/14/1999)</b>						
2	2a - OMB Circular A-25 and SFFAS No. 4	OCFO	06/22/2006	09/30/2006		Resolved
4	2c - OMB Circular A-25 and SFFA No. 4	OCFO	06/22/2006	09/30/2006		Resolved