



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

**OFFICE OF THE
INSPECTOR GENERAL**

August 19, 2010

MEMORANDUM TO: R. William Borchardt
Executive Director for Operations

FROM: Stephen D. Dingbaum */RA/*
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF NRC'S
TELEWORK PROGRAM (OIG-10-A-13)

REFERENCES: EXECUTIVE DIRECTOR FOR OPERATIONS
MEMORANDUM DATED JULY 9, 2010, AND
SUPPLEMENTARY RESPONSES DATED AUGUST 3
AND AUGUST 10, 2010

Attached is the Office of the Inspector General's analysis and status of recommendations 1 thru 8 as discussed in the agency's initial response dated July 9, 2010, and supplementary responses on August 3 and 10, 2010. Based on these responses, recommendation 1 is closed and recommendations 2 through 8 are in resolved status. Please provide an updated status of the resolved recommendations by January 31, 2011.

If you have any questions or concerns, please contact me at 415-5915 or Kathleen Stetson, Team Leader, at 415-8175.

Attachments: As stated

cc: N. Mamish, OEDO
J. Andersen, OEDO
J. Arildsen, OEDO
C. Jaegers, OEDO

Audit Report

AUDIT OF NRC'S TELEWORK PROGRAM

OIG-10-A-13

Status of Recommendations

Recommendation 1: Identify all staff with essential functions to facilitate teleworking in an emergency.

Agency Response
Dated July 9, 2010:

Agree. Offices have responsibility for essential functions and must plan for adequate staff coverage to perform those essential functions during a pandemic. Offices identify staff that have the necessary skills, capability, and are willing to support essential functions through telework. Given the nature of a pandemic, individual staff availability for telework during a pandemic cannot be strictly pre-planned. The Homeland Security Council's (HSC) published guidance recommends identifying positions needed to continue essential functions.

The Pandemic Task Group (PTG) is comprised of representatives from 20 offices to ensure that the Plan reflects the agency's range of needs during a pandemic emergency. Following guidance from the Executive Director for Operations, the group built on the interim plan approved by the Commission.

Although the interim plan and HSC guidance recommended identification of key personnel by position, a few offices stated their preference for identification of personnel by name in a protected, updated document. The PTG determined that such lists met HSC and NRC guidance. Members were advised, however, that the preferred identification of key personnel is by position so that the lists would be unaffected by personnel changes. The guidance was included in the approved agency Pandemic Plan (ML 100271169) as item B in Appendix 5, "Guidance for Office Plans." PTG representatives have reported to the NSIR pandemic plan coordinator that their Offices' lists are complete.

Action Completed.

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Status of Recommendations

Supplementary
Agency Response

Dated August 3, 2010:

NSIR provided OIG with the document, *Essential Personnel for Pandemic Operations*, (ML102170074).

OIG Analysis:

OIG analyzed the approved agency Pandemic Plan (ML 100271169) and Essential Personnel for Pandemic Operations, (ML102170074) and determined that the agency's corrective action meets the intent of the recommendation. Therefore, this recommendation is closed.

Status:

Closed.

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Status of Recommendations

Recommendation 2: Identify methods for accessing information technology systems needed to support essential functions during emergencies.

Agency Response
Dated July 9, 2010:

Agree. In addition to Webmail, Citrix, and BlackBerry devices, OIS plans to begin providing mobile desktops to selected users by the end of the calendar year. The Mobile Desktop program will provide a dockable mobile computer (laptop) which NRC staff may use at the office, at home, and on domestic travel as necessary. The mobile desktop will provide users remote access to essential applications. This supports the Working from Anywhere initiative and will add significant capabilities for telecommuters. This program is pending based on available resources. Currently, OIS is drafting a memo to OCFO to ask for funding for this initiative based on input from the IT Business Council (ITBC).

Target Date for Completion: December 1, 2010.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives documentation and verifies that the agency has identified methods for accessing information technology systems needed to support essential functions during emergencies.

Status: Resolved.

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Status of Recommendations

Recommendation 3: Develop manual or other compensating systems to allow telework if access to the agency's information technology systems is not available.

Agency Response
Dated July 9, 2010:

Agree. If the information technology systems are not available, the Agency's primary functions will be moved to an alternate location. The extent to which telework can be used will vary depending on the process implemented. Each office or region responsible for a particular function will develop a plan that will allow employees to telework to the extent possible.

Target date for Completion: December 1, 2010.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives documentation and verifies that the agency has developed manual or other compensating systems to allow telework if access to the agency's information technology systems is not available.

Status:

Resolved.

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Status of Recommendations

Recommendation 4: Coordinate agency efforts to identify and remove information technology telework barriers, which impede teleworking in an emergency.

Agency Response
Dated July 9, 2010:

Agree. OIS, HR and NSIR will meet to consider whether current initiatives will adequately address the identified challenges to telework in the event of an emergency. Currently, as part of the Disaster Recovery/COOP scenario, NRC has the ability to provide Citrix access via another location. HQ users' email is replicated to the COOP location; so HQ users would have access to email via Citrix.

Target Date for Meeting: December 1, 2010.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives documentation and verifies that the agency has coordinated efforts to identify and remove information technology telework barriers, which impede teleworking in an emergency.

Status:

Resolved.

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Status of Recommendations

Recommendation 5: Reference emergency planning and information technology procedures in telework guidance.

Agency Response
Dated July 9, 2010:

Agree. The guidance on the procedures to be used in the event of an emergency is contained in the COOP Plan. A reference to this information will be included in the Management Directive on Telework.

Target Date for Completion: May 2011.

OIG Analysis:

The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives documentation and verifies that the final management directive and handbook on the telework program includes references to emergency planning and information technology procedures.

Status:

Resolved.

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Status of Recommendations

Recommendation 6: Develop and implement a management directive and handbook for the telework program.

Agency Response
Dated July 9, 2010: Agree. A Management Directive on telework is currently being drafted.

Target Date for Completion: May 2011.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives documentation and reviews the final management directive and handbook on the telework program.

Status: Resolved.

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Status of Recommendations

Recommendation 7: Issue consolidated interim telework guidance pending development of a telework program management directive and handbook.

Agency Response
Dated July 9, 2010: Disagree. While the Management Directive is being written, the telework guidance on the HR website is available for reference and contained in the Collective Bargaining Agreement (CBA). The CBA provides guidance to bargaining unit employees and will continue to do so for those employees. This information should suffice for both bargaining and non-bargaining employees until the Management Directive is issued.

Action Completed.

Supplementary
Agency Response
Dated August 10, 2010: HR will issue guidance while the management directive is being written. The interim guidance will be issued by October 4, 2010.

OIG Analysis: The proposed corrective action addresses the intent of OIG's recommendation. This recommendation will be closed when OIG receives documentation and reviews the interim telework guidance.

Status: Resolved.

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Status of Recommendations

Recommendation 8: Develop and implement a procedure for assessing and reporting the results of full-time telework arrangements to the Office of Human Resources.

Agency Response
Dated July 9, 2010:

Agree. Under our current procedures, full time telework agreements are assessed at the end of a specific period, i.e., one year, by the operating Office. The results are sent to the Office of Human Resources. When HR receives an assessment, it is reviewed to make sure that the employee's duties are still appropriate for the telework agreement to continue and that there are no problems with the current agreement. After reviewing the agreement, if still it meets the criteria for telework, HR approves the agreement for continuation.

Action Completed.

OIG Analysis:

OIG requested written documentation verifying that the agency completed the action described. During a telephone conversation on August 5, 2010, the HR point of contact stated that HR has not documented these procedures in writing. Therefore, this recommendation will remain in a resolved status, and will be closed when OIG receives HR's formal procedure for assessing and reporting the results of full-time telework arrangements to HR.

Status:

Resolved.