



Audit of the Defense Nuclear Facilities Safety Board's Drug-Free Workplace Program

**OIG-DNFSB-25-A-03
July 30, 2025**



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MEMORANDUM

DATE: July 30, 2025

TO: Mary J. Buhler
Executive Director of Operations

FROM: Hruta Virkar, CPA /**RA**/
Assistant Inspector General for Audits & Evaluations

SUBJECT: AUDIT OF THE DEFENSE NUCLEAR FACILITIES SAFETY
BOARD'S DRUG-FREE WORKPLACE PROGRAM
(OIG-DNFSB-25-A-03)

Attached is the Office of the Inspector General's (OIG) audit report titled: *Audit of the Defense Nuclear Facilities Safety Board's Drug-Free Workplace Program*.

The report presents the results of the subject audit. Following the June 17, 2025, exit conference, agency staff indicated that they had no formal comments for inclusion in this report.

Please provide information on actions taken or planned on each of the recommendations within 30 days of the date of this memorandum.

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at 301.415.1982 or Paul Rades, Team Leader, at 301.415.6228.

Attachment:

As stated

cc: K. Herrera, DEDO
J. Biggins, DEDRS
G. Garvin, DEDRS



Results in Brief

Audit of the Defense Nuclear Facilities Safety Board's Drug-Free Workplace Program

OIG-DNFSB-25-A-03

July 30, 2025

Why We Did This Review

Executive Order 12564, *Drug-Free Workplace*, mandated that federal agencies develop plans for achieving the objective of a drug-free workplace and establish programs for testing for the use of illegal drugs by employees in sensitive positions. The Defense Nuclear Facilities Safety Board Drug-Free Workplace Program implements applicable Department of Health and Human Services (HHS) standards and follows Substance Abuse and Mental Health Services Administration (SAMHSA) guidance.

The agency's DFWP provides for applicant testing, random testing, reasonable-suspicion testing, voluntary testing, and testing as a follow-up to counseling or rehabilitation. Testing involves analysis for the presence of marijuana, cocaine, amphetamines, opiates, and phencyclidine.

The audit objective was to determine if the DNFSB is effectively managing the Drug-Free Workplace Program.

What We Found

The Defense Nuclear Facilities Safety Board (DNFSB) effectively manages its Drug-Free Workplace Program (DFWP) to meet basic program objectives. However, the agency should update its *Drug-Free Workplace Plan* (DFW Plan) to align with its current practices. The agency should also improve its internal and external communications to support more efficient program implementation and ensure that it achieves its goal of a drug-free workplace.

Specifically, the DNFSB does not consistently follow its DFW Plan when conducting random drug tests, even though the Plan is designed to allow personnel to implement the program properly. This occurs because the agency's DFW Plan is outdated and incomplete. Inconsistent implementation results in reduced staff confidence in the program and increased administrative burden, and it may compromise knowledge transfer needed for longer-term program sustainability.

What We Recommend

The report makes three recommendations. These recommendations involve updating the agency's DFW Plan, creating implementation guidance, and improving communication.

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ABBREVIATIONS AND ACRONYMS

DFWP	Drug-Free Workplace Program
DFW Plan	<i>Drug-Free Workplace Plan</i>
DNFSB	Defense Nuclear Facilities Safety Board
EAP	Employee Assistance Program
FY	Fiscal Year
HHS	Department of Health and Human Services
IBC	Interior Business Center
OIG	Office of the Inspector General
SAMHSA	Substance Abuse and Mental Health Services Administration
TDP	Testing Designated Positions

I. BACKGROUND

Federal Drug-Free Workplace Program Requirements

Executive Order 12564, *Drug-Free Workplace*,¹ mandated that federal agencies develop plans for achieving the objective of a drug-free workplace and establish programs to test employees in sensitive positions for the use of illegal drugs.

Consistent with Public Law 100-71,² Section 503, the Department of Health and Human Services (HHS) has established standards for federal workplace drug testing programs. The Substance Abuse and Mental Health Services Administration (SAMHSA),³ an operating division of the HHS, has developed the Drug-Free Workplace Toolkit, which provides information to help employers develop and sustain successful DFWPs.

Among the information provided through the Drug-Free Workplace Toolkit, SAMHSA recommends that federal agencies' DFWPs have the following five components:

- Written Policy - forms the foundation for a drug-free workplace program and should include (1) a rationale for the policy; (2) expectations for compliance; (3) assistance options to support employees in following the policy; and, (4) consequences for violating the policy.
- Employee Education - all employees should be prepared to implement a drug-free workplace policy and program. Everyone in the organization needs information about the consequences associated with substance misuse. Furthermore, policy and program provide education and training that reinforce healthy attitudes and behaviors and deepen awareness of how substance misuse can affect employee health and employment.

¹ 51 Federal Regulation 32889 (September 15, 1986).

² Public Law 100-71 (July 11, 1987).

³ The OIG will monitor HHS budget reductions that may impact SAMHSA operations.

- Supervisor Training - to help maximize the effectiveness of the drug-free workplace policy and program. Supervisors should be well-informed about the policy and program and be aware of legally sensitive areas. They must also be trained to document potential problems fairly and systematically, honor confidentiality, and refer employees to appropriate services. Supervisors may also need training to help employees reintegrate into the workplace after receiving services.
- Employee Assistance Program (EAP) - designed to help employees with personal problems that may affect their job performance, such as problems relating to alcohol and other drugs.
- Drug Testing - intended to help protect the workplace from the negative effects of substance misuse. Conducting drug testing helps agencies comply with federal regulations and can deter employees from coming to work unfit for duty.

The DNFSB's DFWP

The DNFSB's DFWP has all five components⁴ of a drug-free workplace. Specifically:

- Written Policy - The agency's policy is the DNFSB DFW Plan. The Plan was last updated in 1996; however, the revised Plan was in the process of being approved at the time of this audit.
- Employee Education and Supervisor Training - The DNFSB held a "Brown Bag" training session with agency employees prior to their first round of testing with the Interior Business Center (IBC)⁵ in fiscal year (FY) 2024. The "Brown Bag" session allowed the DNFSB and the IBC to explain the new drug testing process to agency employees. The DNFSB also has training sessions scheduled through FY 2025.

⁴ The OIG combined Employee Education and Supervisor Training in one category since the two are similar.

⁵ The IBC is a fee-for-service, non-appropriated federal shared service provider, providing Mission Support Services to the Department of the Interior and non-Interior customer agencies. The IBC is headquartered in Washington, D.C. and has been housed within the Department of the Interior for over 30 years.

- Employee Assistance Program - The DNFSB contracts with the HHS for an EAP, which complies with the roles and responsibilities recommended by SAMHSA.
- Drug Testing – For DNFSB staff in “testing designated positions” (TDP),⁶ the agency may employ various types of drug tests: applicant, random, reasonable suspicion, voluntary, and follow-up to counseling or rehabilitation. All DNFSB drug tests are completed via urine testing.

The DNFSB has five grounds for reasonable suspicion testing: (1) observable phenomena, such as direct observation of drug use or possession and/or the physical symptom of being under the influence of a drug; (2) a pattern of abnormal conduct or erratic behavior; (3) arrest or conviction for a drug-related offense; (4) information that is either provided by a reliable and credible source or independently corroborated; or, (5) newly discovered evidence that shows the employee tampered with a previous drug test. Reasonable suspicion testing does not require certainty of drug use.

The DNFSB implements its DFWP with IBC support through an interagency agreement. The current agreement is effective from FY 2024 through FY 2028 with one base year and four option years. The agreement is worth approximately \$70,000 in direct costs, with no additional overhead charges or other fees for the five-year agreement. The DNFSB committed approximately \$16,000 for FY 2025. Accordingly, the IBC for FY 2025 will provide testing for 50 units, including test collection, lab analysis, and medical review officer services. The IBC also provides program support, including test scheduling, results monitoring, troubleshooting, and up to two training sessions. The DNFSB created a SharePoint site prior to its first round of testing with the IBC that includes the agency’s DFW Plan, the locations of testing sites near DNFSB Headquarters, training slides, SAMHSA guidance, and an IBC fact sheet. The SharePoint site is available to DNFSB staff for reference.

⁶ TDPs are positions characterized by critical safety and security responsibilities related to the DNFSB’s mission. Positions identified as TDPs for random testing require the highest degree of trust and confidence. The DNFSB’s policy on TDPs aligns with the Department of Energy’s policy regarding randomly testing positions with security clearances.

Substances Tested

In accordance with Executive Order 12564, Section 503, the DNFSB tests employees for the presence of marijuana, cocaine, amphetamines, opiates, and phencyclidine.⁷ Additional categories of drugs may be included in accordance with the HHS guidelines.

All the listed drugs are Schedule I or Schedule II drugs, as defined under the Controlled Substances Act.⁸ Schedule I drugs are characterized by a high potential for abuse, are not currently accepted for medical use in treatment, and are not accepted as safe for use under medical supervision. Schedule II drugs have a high potential for abuse and may lead to severe psychological or physical dependence but are currently accepted for medical use in treatment in the United States.

Although marijuana (a Schedule I drug) is legal in some states, it remains illegal under federal law. A 2020 memo from SAMHSA stated that there were no proposed changes to the drug testing panel under the federal DFWP, and programs would continue to test for the previously specified Schedule I and Schedule II controlled substances.⁹

Random Drug Test Process

Random drug testing at the DNFSB is designed to follow a standard process. First, employees in TDPs are randomly selected and the supervisors are notified that their direct reports have been selected for testing. If employees are on duty, supervisors notify the IBC of their employees' work location (i.e., agency headquarters, Department of Energy sites, or at home). Supervisors may also defer testing for employees on leave or temporary duty travel. Next, the IBC schedules the drug test based on the location provided by the supervisor. Then, the employee and supervisor are notified of the drug

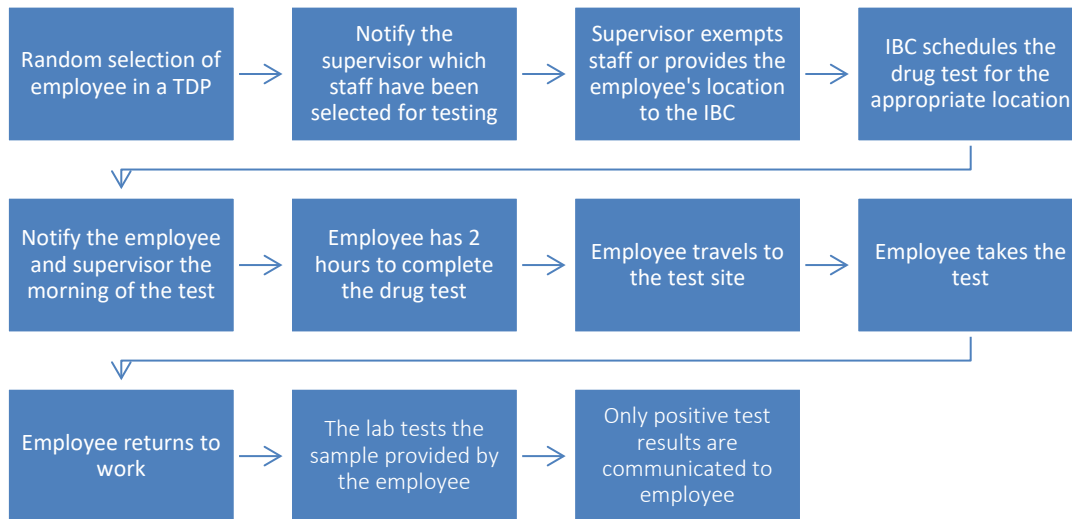
⁷ According to DNFSB officials, effective July 7, 2025, the DNFSB DFWP will test for marijuana; cocaine; amphetamines, including amphetamine, methamphetamine, methylenedioxymethamphetamine, and methylenedioxyamphetamine; opioids, including 6-acetylmorphine, codeine, fentanyl, morphine, hydrocodone, hydromorphone, oxycodone, and oxymorphone; and phencyclidine.

⁸ 21 U.S.C. §§ 801–904.

⁹ The Drug Enforcement Administration within the Department of Justice has recently been engaged in rulemaking activities that would potentially result in marijuana being reclassified as a Schedule III drug. See, e.g., *Schedules of Controlled Substances: Rescheduling of Marijuana*, 89 Federal Regulation 70148 (Aug. 29, 2024) (notice of hearing on proposed rulemaking). At the time of issuance of this report, however, those rulemaking activities had not been completed.

test the morning of the test. The employee is given 2 hours, starting when they schedule their test, to complete their drug test. The employee then travels to the test site, completes the drug test, and returns to work. The laboratory tests the sample provided by the employee, and positive test results are then communicated to the employee by DFWP staff. See Figure 1 for a flow chart showing the DNFSB’s drug testing process.

Figure 1: DNFSB’s Drug Testing Process¹⁰



Source: OIG generated

The IBC conducts drug testing for the DNFSB and schedules the tests based on the employee’s location. This means employees on telework or in areas of the country other than DNFSB Headquarters can be tested at local sites. The DNFSB performed two rounds of random drug testing in FY 2024 with the IBC. In those two rounds, the DNFSB randomly drew 27 employees for testing, but 10 of those tests were deferred,¹¹ and 17 employees were tested.¹²

Employees who test positive for the first time will be referred to the EAP and put into a rehabilitation program. Employees who refuse to participate in the EAP or test positive again are subject to termination.

¹⁰ This process is the same for Resident Inspectors who are tested under the Department of Energy’s DFWP.

¹¹ Employees can be deferred from a random test for a legitimate reason such as leave or official travel. The deferred employees will be placed back into the pool for the next random test.

¹² The DNFSB recently lowered its annual target percentage for random testing from 50 percent to 15 percent of its TDPs due to the agency’s relatively small population.

II. OBJECTIVE

The audit objective was to determine if the DNFSB is effectively managing the Drug-Free Workplace Program.

III. FINDING

The DNFSB effectively manages its DFWP to meet basic program objectives. However, the agency should update its DFW Plan to align with current practices. The agency should also improve its internal and external communications to support more efficient program implementation and ensure that it is achieving its goal of a drug-free workplace.

1. Outdated and Incomplete Guidance

The DNFSB does not consistently follow its DFW Plan when conducting random drug tests, even though the DFW Plan is designed to allow personnel to implement the DFWP properly. According to the Government Accountability Office's *Standards for Internal Control in the Federal Government*, management should communicate policies and procedures so personnel can implement internal control activities for their assigned responsibilities. Because the DFW Plan is outdated and incomplete, the DNFSB does not consistently follow its DFWP. Inconsistent implementation results in reduced staff confidence in the program, increased administrative burden and may compromise knowledge transfer needed for longer-term program sustainability.

What Is Required

Documentation of Responsibilities Through Policies

According to the Government Accountability Office's *Standards for Internal Control in the Federal Government*,¹³ management should communicate policies and procedures so personnel can implement internal control activities for their assigned responsibilities. Furthermore, management should select the appropriate method of communication.

¹³ [U. S. Government Accountability Office, Standards for Internal Control in the Federal Government, GAO-14-704G, September 2014](#)

What We Found

The DNFSB's DFWP Could Improve Its Communication

The agency's DFWP officials could improve their communication with agency staff to clarify roles and responsibilities and facilitate consistent adherence to program policies.

Roles and Responsibilities Could Be Clarified

In FY 2024, 27 DNFSB personnel were randomly selected for testing. Of those 27 personnel, 10 were deferred from testing. Among this group of 10 deferrals, 9 employees were on leave or official travel. However, one employee was deferred at a manager's discretion due to miscommunication with the IBC regarding testing venues, which rendered testing infeasible during the employee's workday. The agency's DFW Plan states that a legitimate reason must be given for deferred testing and specifically cites leave or official travel as legitimate reasons.¹⁴ However, the Plan does not address other scenarios in which drug testing may be impractical or contrary to the agency's mission, nor does it specify which agency officials are authorized to defer an employee's test. Further, the Plan does not address potential sanctions if an agency official illegitimately excuses an employee from testing.

Poor Communication Leads to Process Inconsistencies

In discussions with DFWP and IBC staff, the OIG learned that the DFWP staff are expected to contact DNFSB supervisors the day before the supervisors' employees are directed to report for random testing. This process is intended to confirm that employees are not on leave or in travel status and enables the IBC to schedule the drug tests at convenient locations.¹⁵ The DFWP staff did not, however, always inform supervisors the day before random drug testing that their employees had been selected for testing. This led to inconsistent

¹⁴ The Plan states, "failure to appear for testing without a deferral or acceptable explanation will be considered refusal to participate in testing, and will subject an employee to the range of disciplinary actions."

¹⁵ Headquarters employees may report to test facilities near the agency's Washington, D.C. office. Resident Inspectors and Headquarters employees that are teleworking are given options for testing facilities based on their home zip codes.

drug-testing processes and highlighted a weakness in internal agency communication.

The OIG noted two scenarios in which communication could have been improved. First, for 10 of the 27 selected employees, supervisors were not informed that the IBC had selected their employees and the IBC reached out directly to the employees on the day of testing. According to DFWP and IBC staff, the supervisors could have and should have been contacted on the day before testing so they could state the employee's location and state whether there was a need to defer testing.

The second scenario relates to the 17 completed random drug tests. The OIG noted that the supervisor was not contacted the day before 7 of the 17 completed tests, and the tests were not scheduled in the most convenient location for the employee. In four cases, the employee had to contact the IBC to reschedule the test at a more convenient location. In two cases, the employee traveled to a less convenient location instead of rescheduling the test. One of these employees traveled approximately 88 miles roundtrip, and the other traveled approximately 2 hours roundtrip.¹⁶ In the final case, the employee was excused from testing without a legitimate reason.

The OIG surveyed DNFSB staff to solicit their perspectives on the agency's DFWP. One survey question asked for suggested improvements to the DFWP. DNFSB staff noted that the DFWP could be improved through better communication and more consistent notifications to both supervisors and employees. Several respondents also indicated that the DFWP would benefit if tests are scheduled in more convenient locations and if, prior to scheduling testing, the agency determined whether staff will be on leave or on official travel. Both suggestions could be addressed if the DNFSB ensures that supervisory notifications occur the day before employees are directed to report for testing.

Why This Occurred

The DFW Plan Is Outdated and Incomplete

The DNFSB's DFW Plan is outdated, and there is no implementing guidance to help staff ensure consistency and compliance with the DFWP. Specifically, the Plan was last revised in 1996; therefore, all the SAMHSA updates and any

¹⁶ Employees are reimbursed for mileage while traveling to and from testing sites.

changes DNFSB made to its DFWP since 1996 are not included in the DFW Plan. For example, the DNFSB changed the coverage of the yearly tests from 50 percent to 15 percent of the TDP population, but the Plan still states that 50 percent of TDPs will be tested yearly. Additionally, the Plan still refers to the General Manager and assigns significant duties to that position even though the position was eliminated from the DNFSB's organizational structure within the last year.

Furthermore, the Plan does not achieve its stated purpose of setting forth objectives, policies, procedures, and implementation guidelines to achieve a drug-free federal workplace at the DNFSB. The Plan is an overarching policy that does not focus on the day-to-day implementation of procedures or offer procedural guidance to help implement the DFWP. Implementation guidance for a DFWP should include the procedures for the different types of drug tests, as well as the roles and responsibilities of the parties involved. The DNFSB should also include in its guidance a mechanism to determine whether an excuse from random testing, outside of leave or travel, is acceptable, and specify appropriate actions where an employee or supervisor fails to comply with testing procedures. Further, the day-to-day drug-testing policy should include procedures to make the process more consistent and ensure that the supervisor is notified before each test.

Why This Is Important

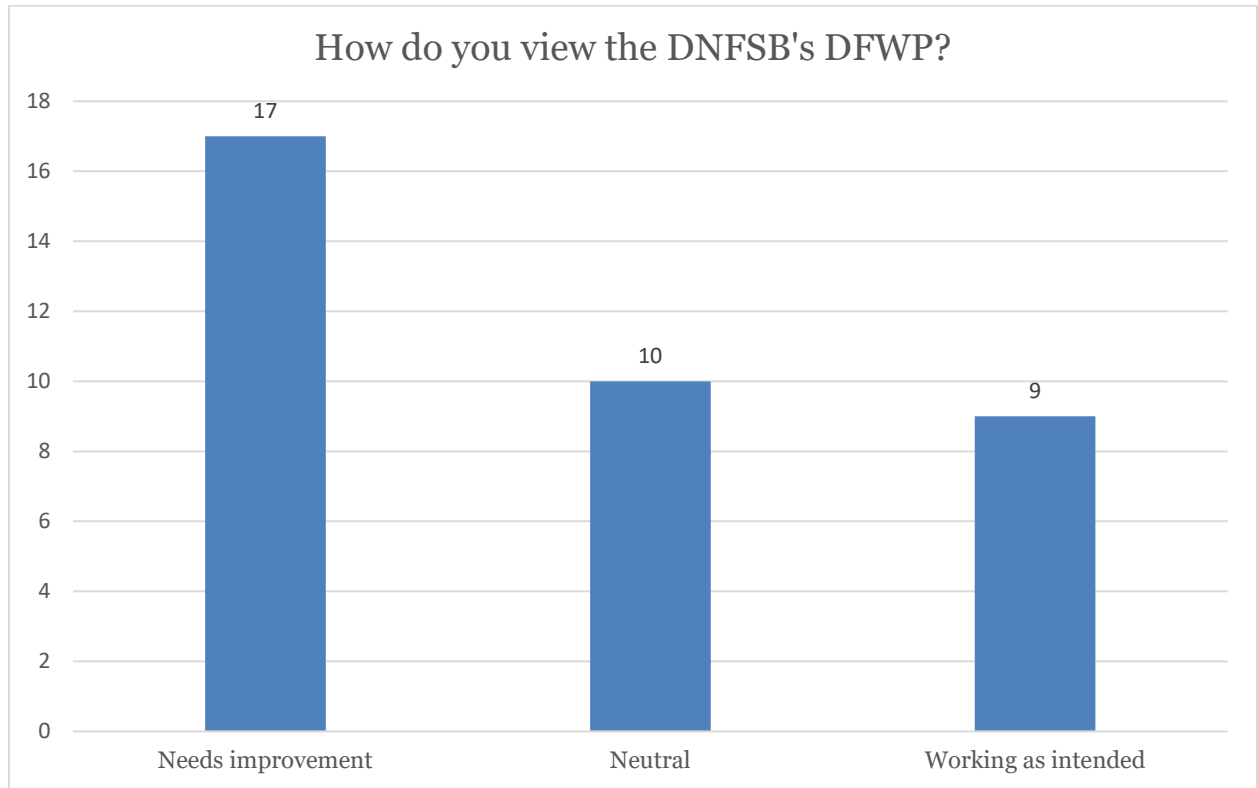
Inconsistent Program Implementation Weakens Employee Confidence, Adds Administrative Burden, and Compromises Knowledge Transfer

Inconsistent implementation results have reduced staff confidence in the program, increased administrative burden, and may compromise knowledge transfer needed for longer-term program sustainability. The DNFSB's DFWP policy and practice are misaligned, and DNFSB staff have consequently become confused by the process. The confusion has led to the staff losing confidence in the program. Figure 2 below depicts the DNFSB staff's responses to an OIG survey. The survey questions asked how the staff viewed the agency's DFWP. Of the 36 respondents, 17 thought the DFWP needed improvement, 10 remained neutral, and 9 felt the DFWP was working as intended.¹⁷ Therefore, only a quarter of the survey respondents felt the DFWP

¹⁷ The DNFSB has approximately 100 full-time equivalents in TDPs.

was working as intended. Specifically, one survey respondent stated the DFWP “appears chaotic, unorganized, and haphazard.”

Figure 2: DNFSB Staff Responses to the OIG Survey



Source: OIG generated

DNFSB employees also believed that the notification portion of the random testing process has been applied inconsistently to DNFSB employees and their supervisors. This inconsistency in the DFWP has resulted in tests being scheduled in inconvenient locations for employees. The time spent rescheduling tests or traveling to inconvenient locations could have been spent doing core duties. In addition, the DNFSB is at risk of reimbursing unnecessary local travel expenses.

Finally, documenting drug-testing processes, and updating related policies and procedures, is important because it prevents the loss of institutional knowledge due to staff turnover. This is particularly significant because, in early FY 2025, the DNFSB Drug Program Coordinator retired, reducing the overall program knowledge that remained undocumented in the DNFSB’s outdated DFWP Plan.

Recommendations

The OIG recommends that the DNFSB:

- 1.1 Update the agency's DFW Plan to reflect current practices;
- 1.2 Create supporting implementation guidance with emphasis on staff roles and responsibilities; and,
- 1.3 Engage the testing contractor to improve communications with program staff and supervisors regarding random test site selections.

V. DNFSB COMMENTS

The OIG held an exit conference with the agency on June 17, 2025. Before the exit conference, agency management reviewed and provided comments on the discussion draft version of this report, and the OIG discussed these comments with the agency during the conference. Following the conference, agency management stated their general agreement with the findings and recommendations in this report and opted not to provide additional comments. The OIG has incorporated the agency's comments into this report, as appropriate.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The audit objective was to determine if the DNFSB is effectively managing the Drug-Free Workplace Program.

Scope

This audit focused on the DNFSB's DFWP for FY 2024. We conducted this performance audit at DNFSB headquarters (Washington, D.C.) and in Rockville, Maryland, from November 2024 to April 2025.

Internal controls related to the audit objective were reviewed and analyzed. Specifically, the OIG reviewed the components of control environment, risk assessments, control activities, information and communication, and monitoring. Within those components, the OIG reviewed the principles of establishing an organizational structure, assigning responsibility, and delegating authority to achieve the entity's objectives; evaluating performance and holding individuals accountable for their internal control responsibilities; defining objectives clearly to enable the identification of risks and defining risk tolerance; identifying, analyzing, and responding to risks related to achieving the defined objectives; identifying, analyzing, and responding to significant changes that could impact the internal control system; designing control activities to achieve objectives and respond to risks; designing the entity's information system and related control activities to achieve objectives and respond to risks; implementing control activities through policies; using quality information to achieve the entity's objectives; communicating the necessary quality information to achieve the entity's objectives; establishing and operating monitoring activities to monitor the internal control system and evaluate the results; and, remediating identified internal control deficiencies on a timely basis.

Methodology

The OIG reviewed relevant criteria for this audit, including, but not limited to:

- Executive Order 12564 – *Drug-Free Federal Workplace*;
- Public Law 100-71;
- Title 41 United States Code Chapter 81: *Drug-Free Workplace*;

- Title 42 Code of Federal Regulations Chapter I – *Mandatory Guidelines for Federal Workplace Drug Testing Programs*; and,
- Defense Nuclear Facilities Safety Board – *Drug-Free Workplace Plan*

The OIG interviewed DNFSB DFWP staff and supervisors to understand the DNFSB DFWP, firsthand. We also interviewed the IBC contractor who schedules drug tests for DNFSB. Additionally, the OIG interviewed Nuclear Regulatory Commission DFWP staff to benchmark the Nuclear Regulatory Commission’s DFWP. Finally, the OIG interviewed staff who conducted an internal controls assessment of the DNFSB’s DFWP in FY 2023 to understand their methodology and to discuss their findings.

In addition, the OIG created and issued a survey for the DNFSB staff to gauge DNFSB staff’s perceptions of their DFWP program. The survey was created using Microsoft Forms and had 36 respondents. The DNFSB has approximately 100 full-time equivalents in TDPs, but this number fluctuates throughout the year. The 36 respondents do not constitute a statistically significant sample. The types of questions asked were multiple-choice and short answers. The survey was anonymous, but at the end of the survey, staff had the opportunity to leave their contact information if they wished to be interviewed by the OIG. The OIG interviewed four of the respondents.

During the audit, the OIG did not access or review any data systems. Instead, the OIG conducted interviews, reviewed relevant criteria and documentation provided by DNFSB staff, and analyzed survey results.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Throughout the audit, auditors considered the possibility of fraud, waste, and abuse in the program.

The audit was conducted by Paul Rades, Team Leader; George Gusack, Audit Manager; and, Jocelyn Rivera, Management Analyst.

TO REPORT FRAUD, WASTE, OR ABUSE

Please Contact:

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11555 Rockville Pike
Rockville, Maryland 20852

COMMENTS AND SUGGESTIONS

If you wish to provide comments on this report, please email the OIG using this [link](#).

In addition, if you have suggestions for future OIG audits, please provide them using this [link](#).

NOTICE TO NON-GOVERNMENTAL ORGANIZATIONS AND BUSINESS ENTITIES SPECIFICALLY MENTIONED IN THIS REPORT

Section 5274 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, amended the Inspector General Act of 1978 to require OIGs to notify certain entities of OIG reports. In particular, section 5274 requires that, if an OIG specifically identifies any non-governmental organization (NGO) or business entity (BE) in an audit or other non-investigative report, the OIG must notify the NGO or BE that it has 30 days from the date of the report's publication to review the report and, if it chooses, submit a written response that clarifies or provides additional context for each instance within the report in which the NGO or BE is specifically identified.

If you are an NGO or BE that has been specifically identified in this report and you believe you have not been otherwise notified of the report's availability, please be aware that under section 5274 such an NGO or BE may provide a written response to this report no later than 30 days from the report's publication date. Any response you provide will be appended to the published report as it appears on our public website, assuming your response is within the scope of section 5274. Please note, however, that the OIG may decline to append to the report any response, or portion of a response, that goes beyond the scope of the response provided for by section 5274. Additionally, the OIG will review each response to determine whether it should be redacted in accordance with applicable laws, rules, and policies before we post the response to our public website.

Please send any response via email using this [link](#). Questions regarding the opportunity to respond should also be directed to this same address.