Office of Inspector General Washington, DC 20546-0001



November 13, 2008

TO: Assistant Administrator for Infrastructure and Administration

Assistant Administrator for Security and Program Protection

FROM: Assistant Inspector General for Auditing

SUBJECT: Final Memorandum on the Review of NASA Stolen Property at Goddard

Space Flight Center and Marshall Space Flight Center (Report No. IG-09-003; Assignment No. S-08-003-00)

Since 2004, NASA personal property management has been the focus of considerable attention from the media, Congress, the Government Accountability Office (GAO), and the Office of Inspector General (OIG). In a June 2007 report, GAO noted that NASA reported a loss of more than \$94 million of equipment in fiscal years (FY) 1997 through 2006 and that NASA's failure to keep track of its equipment leaves valuable items vulnerable to theft and misuse. Over the last 4 years, the NASA OIG has been monitoring NASA initiatives to improve property management within the Agency.

This memorandum presents the results of a limited, follow-up review¹ we conducted of incidents of stolen property at Goddard Space Flight Center (GSFC) and Marshall Space Flight Center (MSFC). The overall objective of the review was to determine whether NASA stolen property was being reported in accordance with NASA Procedural Requirements (NPR) and NASA Policy Directives (NPD). We focused our review on stolen property (as opposed to lost, damaged, or destroyed property) so we could identify crime indicators and make recommendations designed to reduce NASA's vulnerability to criminal activity. (See Enclosure 1 for details on the review's scope and methodology.) We also reviewed Agency policies and procedures governing NASA equipment management and reporting.

Executive Summary

We found variances in how stolen property was reported at GSFC and MSFC and inconsistencies in Agency policies and procedures for reporting stolen property. At GSFC, stolen property was not always properly recorded and reported in accordance with NASA guidance because information about stolen property incidents was not reconciled between logistics and security offices. At MSFC, we found that the MSFC

¹ An OIG review (Assignment No. A-04-031-00) of stolen property was initiated in April 2004 but, at that time, preliminary information collected did not warrant formal reporting. The assignment was terminated in October 2004.

logistics office's process of referring all NASA property incidents to the security office resulted in stolen property incidents being recorded and reported in compliance with NASA policies and procedures. During our review of incidents of stolen property at the two Centers, we also found that definitions and dollar thresholds governing property reporting in NASA policies and procedures were not always consistent.

GSFC employees and offices charged with monitoring and safeguarding property need to improve, through increased communication and information sharing, their coordination of stolen property incidents. The GSFC security office was unaware of 41 percent of the stolen property incidents processed by the logistics office over a 2-year period and the Logistics Division was unaware of 38 percent of the theft investigations conducted by the Security Division. GSFC security officials also reported that some employees who report theft incidents to the security office either are not aware of or do not comply with equipment management policies that require them to inform logistics personnel by initiating a Property Survey Report. As a result, not all thefts were investigated, not all investigations of theft were properly recorded, and not all stolen property was reported to NASA Headquarters. To ensure proper recording and reporting of stolen property incidents, in our September 26, 2008, draft we recommended that GSFC logistics and security officials institute a process to periodically reconcile information on reported incidents of stolen NASA equipment. We further recommended that GSFC logistics and security officials issue a Center-wide notification to employees about the proper procedures for reporting incidents of theft or suspected theft of NASA property.

We also found that NASA does not have procedures for reporting incidents of theft that occur off-Center. For example, our review at GSFC revealed that local police were notified of, and investigated, 6 such incidents of theft of NASA property, while Center security were unaware that the incidents had occurred. Thus, in our draft memorandum we also recommended that Headquarters logistics management revise NASA policy to include specific procedures for reporting and recording stolen property incidents that occur off-Center.

As part of our review, we identified several inconsistencies between policy and procedure documents governing NASA equipment and reporting that warrant management attention. For example, two policy documents define capital equipment but one uses an acquisition cost of \$5,000 or more, while the other uses an acquisition cost of \$100,000 or more; for controlled equipment one document defines the acquisition cost as \$1,000 or more, while another defines the acquisition cost as \$5,000 or more. As a result, in our draft memorandum we recommended that the Headquarters' offices responsible for oversight of these documents implement revisions of the policy documents to resolve these inconsistencies.

Management concurred with all of our recommendations and management's comments on the draft of this memorandum are responsive (see Enclosure 2). We will close the recommendations upon completion and verification of management's corrective action.

Roles and Responsibilities for Equipment Management

NPR 4200.2B, "Equipment Management Manual for Property Custodians," revalidated September 11, 2003, establishes Agency roles and responsibilities for employees, Center supply and equipment management officials, and Center security officials and provides operational procedures for NASA equipment management transactions. The Center supply and equipment management officials are responsible for providing functional management, implementing policies and procedures, establishing controls, and performing record maintenance. At each Center, the Logistics Division Directors or Chiefs are the officials responsible for the NASA Equipment Management Program. Those officials, with the concurrence of the supply and equipment management official, appoint property custodians. The NASA Logistics Management Division, Headquarters, is responsible for developing guidance and providing Agency-wide oversight of equipment management. In accordance with NPR 4200.2B, at each Center, a supply and equipment management official reports to both the Headquarters Logistics Management Division and the Center logistics management office.

NPR 4200.2B requires that property custodians ensure that equipment users complete and file a Property Survey Report to ensure that incidents of missing or stolen equipment are investigated, documented, and reported promptly to Center logistics management and security officials. The Center security officials are to complete an investigation report, which is to be filed with the final Property Survey Report. NPR 4200.2B also requires that every employee notify the supervisor, property custodian, and the Center security officer immediately if theft of Government property is suspected. In accordance with NPR 1600.1, "NASA Security Program Procedural Requirements," November 3, 2004, Center security officials are also required to coordinate investigative activity with, and/or refer investigative activity to, the OIG office located at the Center.

At GSFC, more than 200 property custodians monitor property and equipment and conduct an inventory of all NASA equipment tagged for inventory control on a tri-annual basis for their respective office areas. GSFC's Supply and Equipment Management Branch of the Information and Logistics Management Division (Logistics) monitors all property and equipment at the Center.

At MSFC, the Logistics Services Office monitors all property and equipment at the Center using the services of four property custodians to conduct an annual inventory of all NASA equipment tagged for inventory control. At MSFC, all NASA equipment identified by property custodians as missing, whether lost, damaged, destroyed, or believed to be stolen, is referred to Protective Services Division (security office) for investigation.

GSFC Observations

We found that GSFC's compliance with NASA guidance on reporting incidents of stolen property could be improved through increased communications and information sharing between Logistics and the Security Division. To determine whether incidents of stolen property were being reported in accordance with NASA requirements, we reviewed

22 Property Survey Reports processed by Logistics in FYs 2006 and 2007 to determine whether they were accompanied by a security theft investigation of stolen NASA equipment. We also reviewed 39 equipment theft investigations conducted by the Security Division during calendar years 2006 and 2007 to determine whether they were accompanied by a Property Survey Report for stolen property. The number of Property Survey Reports we reviewed does not correlate to the number of theft investigations reviewed because not all of the 39 theft investigations were subject to Logistics oversight—i.e., some were thefts of contractor property rather than NASA property, others were thefts of low-dollar value Government equipment, below the threshold for Logistics' control.

Of the 22 Property Survey Reports processed by Logistics, we found that the Security Division was unaware of 9 (41 percent). NPR 4200.2B requires that employees and/or property custodians report thefts to Center security and that an investigation report be filed with the finalized Property Survey Report. None of the 9 Property Survey Reports was accompanied by a Security Division equipment theft investigation; however, 6 of the 9 Property Survey Reports were accompanied by investigation reports provided by the local police for GSFC property stolen off-Center. The remaining 3 Property Survey Reports had no accompanying investigation report.

Although we believe that filing a local police investigation report for the off-Center stolen property incidents complies with the intent of NPR 4200.2B, the lack of specific procedures for reporting off-Center incidents resulted in Center security being unaware of the 6 stolen property incidents. The lack of awareness by Center security of all 9 of these equipment thefts could be considered significant as Center security has a reporting obligation under NPR 1600.1, to submit quarterly reports of stolen property incidents to the Office of Security and Program Protection (OSPP), Headquarters. Since the Security Division was unaware of the 9 thefts, the theft information for these items was not incorporated into the quarterly reports to Headquarters; thus, the Security Division and OSPP lacked theft information about NASA property for which each has oversight responsibility.

Of the 39 equipment theft investigations conducted by the Security Division, we found that Logistics was unaware of 15 (38 percent) thefts of equipment subject to Logistics' oversight. In discussing the 15 incidents with Security Division, we were informed that when employees report stolen property incidents, Security officials remind users of their property responsibilities under NPR 4200.1F, which requires users to initiate a Property Survey Report for all property that they determine has been lost, damaged, or destroyed or they believe to have been stolen. Because users had not initiated Property Survey Reports, Logistics was not aware of these 15 equipment thefts and the true disposition of the property's status was not accurately reflected on Logistics' records.

We met with and exchanged numerous communications with both GSFC Logistics and Security Division officials about our stolen property reconciliation efforts. In discussing our observations with them, the representatives of both offices agreed that their operational responsibilities would have benefited had they communicated and coordinated better on incidents of reported NASA stolen equipment.

Recommendations, Management's Response, and Evaluation of Management's Response

Recommendation 1. The Director, Logistics Management Division, Headquarters, should revise NPR 4200.2B, "Equipment Management Manual for Property Custodians," to include specific procedures for recording and reporting stolen property incidents that occur off-Center and ensure that those incidents are reported to Center Security officials.

Management's Response. The Assistant Administrator, Office of Infrastructure and Administration (OIA), and the Assistant Administrator, Office of Security and Program Protection (OSPP), concurred with our recommendation and proposed appropriate action. LMD has established procedures for recording and reporting stolen property incidents at the Center and for notifying the Center Security Officials and, for thefts that occur off-site, will add additional language to the procedures to cover reporting such thefts. Also, draft NASA Interim Directive (NID) NPR 4200.1B has a recommendation that a representative from the Security Office be a member of the Property Survey Board² to ensure that the Center Security Office is aware of any incidents of stolen property.

Evaluation of Management's Response. Management's planned action is responsive. The recommendation is resolved and will be closed upon completion and verification of management's corrective action.

Recommendation 2. The Goddard Space Flight Center, Chief, Information and Logistics Management Division, and Chief, Security Division, should institute a process to periodically reconcile information on reported incidents of stolen NASA equipment.

Management's Response. The Assistant Administrator OIA and the Assistant Administrator OSPP concurred with our recommendation and proposed appropriate action. GSFC's Logistics and Security Divisions have designated representatives who will meet, beginning in October 2008, on a quarterly basis to reconcile incidents of stolen NASA property.

Evaluation of Management's Response. Management's planned action is responsive. The recommendation is resolved and will be closed upon completion and verification of management's corrective action.

² The Property Survey Board investigates and makes recommendations concerning the loss, damage, or destruction of property exceeding a specific acquisition value. Currently, NASA policy specifies two different values; however, the Agency plans to revise its policies to correct inconsistencies (see p. 7 in this document).

Recommendation 3. The Goddard Space Flight Center, Chief, Information and Logistics Management Division, and Chief, Security Division, should issue a Centerwide notification to inform staff of the proper procedures for reporting incidents of theft or suspected theft of NASA property.

Management's Response. The Assistant Administrator OIA and the Assistant Administrator OSPP concurred with our recommendation and proposed appropriate action. The GSFC Logistics and Security Divisions will collaborate to generate a Center-wide announcement, to be distributed by November 30, 2008, to ensure personnel understand the proper procedures for reporting incidents of theft or suspected theft of NASA property.

Evaluation of Management's Response. Management's planned action is responsive. The recommendation is resolved and will be closed upon completion and verification of management's corrective action.

MSFC Observations

We found that MSFC Logistics' process of initially designating property as missing—whether missing, damaged, destroyed, or believed stolen—until a theft determination is made, resulted in stolen property incidents being properly recorded and reported in accordance with NASA guidance.

To determine whether incidents of stolen property were being reported at MSFC in accordance with NASA guidance, we reviewed 45 Property Survey Reports processed by Logistics in FYs 2006 and 2007 to determine whether the reports were accompanied by an equipment incident report conducted by MSFC Protective Services. Since MSFC Logistics' process is to initially designate all property as missing, all Property Survey Reports—regardless of designation—are referred to MSFC Protective Services for investigation. Protective Services reviews the circumstances of each referral and makes its own determination as to whether to assign the case as a missing property incident or as a potentially stolen property investigation.

Of the 45 Property Survey Reports referred to MSFC Protective Services, 44 were accompanied by an incident report. MSFC Protective Services chose not to open an investigation on one item because they learned that the item had actually been cannibalized and, therefore, was not stolen. We also identified that of 45 Property Survey Reports we reviewed, 2 were for stolen property incidents that occurred off-Center. These 2 Survey Reports contained both the local police investigative report and an incident report by MSFC Protective Services documenting their awareness of the local police investigation.

Consistence of NASA Policies and Procedures

Our review of NASA's policies and procedures documents governing NASA equipment management and reporting identified dollar-valuation inconsistencies related to defining categories of equipment as well as dissimilar requirements for reporting stolen property statistics. We believe the policy inconsistencies warrant management attention. The dollar-valuation inconsistencies we found include the following:

- NPR 4200.2B, Appendix A, defines capital equipment as equipment having an acquisition cost of \$5,000 or more and controlled equipment as having an acquisition cost of \$1,000 or more. However, NPR 4200.1F, Appendix A, defines capital equipment as having an acquisition cost of \$100,000 or more and controlled equipment as having an acquisition cost of \$5,000 or more.
- NPR 4200.2B, Appendix M, states environmentally hazardous devices are to be controlled only if such a device has an acquisition value of \$500 or more. However, NPR 4200.1F, Appendix C, states that all such devices are to be controlled, regardless of acquisition cost.
- NPR 4200.2B, Appendix A, defines noncapital, nonsensitive, controlled equipment as items with an acquisition cost between \$1,000 and \$4,999 and not identified as sensitive. However, NPR 4200.1F, Appendix A, defines these items as having an acquisition cost between \$5,000 and \$99,999.
- NPR 4200.2B, Appendix A, defines noncontrolled equipment as equipment not designated as sensitive that has an acquisition cost of less than \$1,000. However, NPR 4200.1F, Appendix A, defines noncontrolled equipment as having an acquisition cost of less than \$5,000.
- NPR 4200.2B, Appendix A, defining a Property Survey Board, states that
 members will investigate and make recommendations concerning the loss,
 damage, or destruction of property exceeding \$1,000 in acquisition value.
 However NPR 4200.1F, Appendix A, defines the valuation threshold under these
 circumstances as exceeding \$5,000 in acquisition value.

Inconsistencies in dollar valuations in policy guidance could foster confusion among those responsible for controlling equipment and, possibly, lead to reporting errors.

During a follow-up meeting with the Director, Logistics Management Division, Headquarters, we called management's attention to the inconsistencies and the possibility for confusion among staff required to use the policy documents for recording and reporting types of equipment. Headquarters concurred with our observations and initiated a review of equipment management requirements citing the inconsistencies in dollar valuations we identified for the various categories of equipment. As of September 10, 2008, the Agency was in the process of initiating corrective action to resolve the inconsistencies noted and was also reviewing the policies and procedures for any additional updates required.

We observed a similar inconsistency in NASA's security policy guidance with regard to reporting. NPD 1600.2D, "NASA Security Policy," April 28, 2004, and NPR 1600.1 require reporting dissimilar quarterly stolen property statistics to OSPP. For example, NPR 1600.1 seeks information on the number of items stolen, nomenclature, report number, and date; whereas NPD 1600.2D only requires the number of items stolen and

dollar value of stolen property be reported. During a follow-up meeting, the former Deputy Assistant Administrator, OSPP, agreed to take action to correct the inconsistency we identified in the reporting of quarterly stolen property statistics.

Recommendations, Management's Response, and Evaluation of Management's Response

Recommendation 4. The Director, Logistics Management Division, Headquarters, should resolve dollar value inconsistencies and implement consistent policy revisions for NPR 4200.2B, "Equipment Management Manual for Property Custodians," and NPR 4200.1F, "NASA Equipment Management Procedural Requirements."

Management's Response. The Assistant Administrator OIA and the Assistant Administrator OSPP concurred with our recommendation and proposed appropriate action. LMD has revised both documents to resolve dollar value inconsistencies and implemented consistent policy revisions for both NPR 4200.2B (expected to be issued as a NID by January 2009) and NID NPR 4200.1F (effective on May 19, 2008³).

Evaluation of Management's Response. Management's planned action is responsive. The recommendation is resolved and will be closed upon completion and verification of all related corrective action.

Recommendation 5. The Assistant Administrator, Office of Security and Program Protection, should resolve inconsistencies between NPD 1600.2D, "NASA Security Policy," and NPR 1600.1, "NASA Security Program Procedural Requirements," with regard to reporting quarterly stolen property statistics and implement the appropriate policy revisions.

Management's Response. The Assistant Administrator OIA and the Assistant Administrator OSPP concurred with our recommendation and proposed appropriate action. NPR 1600.1 is undergoing a rewrite. Subsequent to the rewrite, NPD 1600.2D will require updating. OSPP will make the necessary changes to both documents to resolve inconsistencies. Both directives are to be updated and approved by December 1, 2009. In the interim, the Director for Security Management Division, OSPP, will remind all NASA Center Chiefs of Security to ensure that Appendix K, NASA Security Statistics Format, is used in regards to reporting stolen property. The Center Chiefs of Security will receive this reminder no later than November 1, 2008.

Evaluation of Management's Response. Management's planned action is responsive. The recommendation is resolved and will be closed upon completion and verification of management's corrective action.

³ Management had begun taking corrective action during our review.

We appreciate the courtesies extended to our staff during our review. If you have any questions, or need additional information, please contact Mr. Daniel Devlin, Human Capital and Institutional Management Director, at 202-358-7249.

signed

Evelyn R. Klemstine

2 Enclosures

cc:

Director, Logistics Management Division
Chief, Security Division, Goddard Space Flight Center
Chief, Information and Logistics Management Division, Goddard Space Flight Center
Head, Supply and Equipment Management Branch, Goddard Space Flight Center
Logistics Manager, Marshall Space Flight Center
Security Manager, Marshall Space Flight Center

Scope and Methodology

We performed this review from November 2007 through September 2008. The audit was conducted in compliance with generally accepted government auditing standards except for the supervision requirements under the Field Work Standards for Performance Audits. Due to staff changes during the conduct of the review, audit supervision to provide sufficient guidance and direction to staff was not always documented or performed in a timely manner. However, the lack of documented supervision did not have an adverse impact on the review's observations and conclusions. Accordingly, we believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our review objectives.

We performed fieldwork at Goddard Space Flight Center, Marshall Space Flight Center, and NASA Headquarters. We reviewed NPR 4200.1F, "NASA Equipment Management Procedural Requirements," November 14, 2006; NPR 4200.2B, "Equipment Management Manual for Property Custodians," revalidated September 11, 2003; NPD 1600.2D, "NASA Security Policy," April 28, 2004; and NPR 1600.1, "NASA Security Program Procedural Requirements," November 3, 2004. We held meetings with and obtained stolen property information from both Goddard and Marshall logistics and security officials. We also conducted numerous meetings with Headquarters' Logistics Management Division and Office of Security and Program Protection officials. We compared stolen property statistics and supporting data from each respective Center logistics office against similar data maintained by Center security offices. Where inconsistencies were found to exist, we presented our observations to the cognizant Center logistics or security management officials. Instances that could not be reconciled or resolved promptly are discussed within this memorandum.

Computer-Processed Data. We did not use computer-processed data to perform this audit.

Review of Internal Controls. In this limited review of stolen property incidents, we reviewed NASA policies and procedures and internal controls related to stolen property and equipment management. We identified the weaknesses discussed in the text of this report. Our recommendations, once implemented, will improve controls, recording, and reporting related to NASA equipment management.

Prior Coverage. During the last 5 years, GAO issued one report of particular relevance to the subject of this report. Unrestricted reports can be accessed over the Internet at http://www.gao.gov (GAO) and http://oig.nasa.gov/audits/reports/FY08/ (NASA).

Government Accountability Office

"Lack of Accountability and Weak Internal Controls Leave NASA Equipment Vulnerable to loss, Theft, and Misuse" (GAO-07-432, June 25, 2007).

Management's Comments

National Aeronautics and Space Administration Headquarters Washington, DC 20546-0001 NASA

Reply to Attn of: Office of Infrastructure and Administration

TO: Assistant Inspector General for Auditing

FROM: Assistant Administrator for Infrastructure and Administration

Assistant Administrator for Security and Program Protection

October 14, 2008

SUBJECT: Draft Memorandum on the Review of NASA Stolen Property at Goddard

Space Flight Center and Marshall Space Flight Center

(Assignment No. S-08-003-00)

The Office of Infrastructure and Administration's (OIA) Logistics Management Division (LMD), the Office of Security and Program Protection (OSPP) and Goddard Space Flight Center (GSFC) appreciates the Office of Inspector General's (OIG) efforts to help identify deficiencies in our property management and investigative processes. Each office has reviewed the Draft Memorandum on the Review of NASA Stolen Property at Goddard Space Flight Center and Marshall Space Flight Center (Assignment No.S-08-003-00), concurred with the OIG's recommendations, and will be instituting the corrective actions identified below.

<u>OIG Recommendation 1</u>: The Director, Logistics Management Division, Headquarters, should revise NPR 4200.2B, "Equipment Management Manual for Property Custodians," to include specific procedures for recording and reporting stolen property incidents that occur off-Center and ensure that those incidents are reported to Center Security Officials.

Logistics Management Division Response to Recommendation 1: CONCUR

LMD has established specific procedures for recording and reporting stolen property that occurs at the Center and for notifying the Center Security Officials. LMD will add additional language to the procedures which covers reporting theft if the theft occurred off-Center. Additionally, draft NASA Interim Directive (NID) NPR 4200.1B has a recommendation that a representative from the Security Office be a member of the Property Survey Board to ensure that the Center Security Office is aware of any incidents of stolen property.

OIG Recommendation 2: The GSFC Chief of Information and Logistics Management and Chief of Security should institute a process to periodically reconcile information on reported incidents of stolen NASA equipment.

GSFC Response to Recommendation 2: CONCUR

GSFC's Logistics and Security Divisions have designated representatives that will meet on a quarterly basis to reconcile incidents of stolen NASA property. These meetings will begin in October 2008. We consider this recommendation closed for reporting purposes.

<u>OIG Recommendation 3</u>: The GSFC Chief of Information and Logistics Management and Chief of Security should issue a Center-wide notification to inform staff of the proper procedures for reporting incidents of theft or suspected theft of NASA property.

GSFC Response to Recommendation 3: CONCUR

The GSFC Logistics and Security Divisions will collaborate to generate a Center announcement to ensure personnel understand the proper procedures for reporting incidents of theft or suspected theft of NASA property. The announcement will be distributed by November 30, 2008.

OIG Recommendation 4: The Director, Logistics Management Division, Headquarters, should resolve dollar value inconsistencies and implement consistent policy revisions for NPR 4200.2B, "Equipment Management Manual for Property Custodians," and NPR 4200.1F, "NASA Equipment Management Procedural Requirements."

Logistics Management Division Response to Recommendation 4: CONCUR

LMD has revised both documents to resolve dollar value inconsistencies and implemented consistent policy revisions, for both NPR 4200.2B, "Equipment Management Manual for Property Custodians," and NID NPR 4200.1F, "NASA Equipment Management Procedural Requirements." NID NPR 4200.1F, "NASA Equipment Management Procedural Requirements" was effective on May 19, 2008, and is currently posted on NODIS. NPR 4200.1B is currently being revised by LMD based on comments from the Centers and expected to be issues as a NID by January 2009.

OIG Recommendation 5:

The Assistant Administrator, Office of Security and Program Protection, should resolve inconsistence between NPD 1600.2D, "NASA Security Policy" and NPR 1600.1, "NASA Security Program Procedural Requirements", with regards to reporting quarterly stolen property statistics and implement the appropriate policy revisions.

OSPP Response to Recommendation 5: CONCUR

NPR 1600.1, "NASA Security Program Procedural Requirements", is currently undergoing a rewrite. Subsequent to the NPR rewrite, NPD 1600.2D "NASA Security Policy" will require updating. The Office of Security and Program Protection will make the necessary changes to both documents in order to resolve inconsistencies. Both directives are projected to be updated and approved as official NASA policy by December 1, 2009. In the interim, the Director for Security Management Division, OSPP will remind all NASA Center Chiefs of Security to ensure that Appendix K, NASA Security Statistics Format with regards to

reporting stolen property. The Center Chiefs of Security will receive this reminder no later than November 1, 2008.

Should you have questions or require further information, please contact Michele Dodson on 202-358-1049 or Fatima Johnson at 202-358-1631.

Olga M. Dominguez

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