FY 2009 BUDGET SUBMISSION



Office of Inspector General Railroad Retirement Board



UNITED STATES RAILROAD RETIREMENT BOARD

OFFICE OF INSPECTOR GENERAL

September 5, 2007

The Honorable Stephen S. McMillin Acting Director
Office of Management and Budget
Eisenhower Executive Office Building
725 17th Street, N.W.
Washington, D.C. 20503

RE: Railroad Retirement Board - Office of Inspector General FY 2009 Budget Request

Dear Mr. McMillin:

We are respectfully submitting the budget request for the Railroad Retirement Board - Office of Inspector General (RRB-OIG), for fiscal year (FY) 2009. This request, prepared in compliance with Office of Management and Budget Circular No. A-11, is being submitted concurrently to the Congress.

RRB-OIG focuses their audit and investigative efforts on protecting the integrity of the Railroad Retirement Board's (RRB) trust funds and improving the delivery of benefits to the railroad community. The Office of Audit (OA) performs audits, inspections and management reviews to improve the economy, efficiency and effectiveness in the administration of RRB programs. Through its work, OA identifies operational problems and program weaknesses, and provides recommendations for corrective actions as well as cost savings. The Office of Investigations (OI) conducts investigations to identify fraud, waste, and abuse in agency programs and refers cases for prosecution or monetary recovery. RRB-OIG keeps the RRB Chairman and the Congress informed of any agency operational problems or deficiencies.

We are requesting your support for the FY 2009 funding level of \$7,606,000 to continue our oversight operations. In FY 2009, we will continue to conduct money saving audits of agency programs, management reviews, and fraud investigations. The cost of contracts for mandated annual audits of the RRB's information systems security, statement of social insurance and disaster recovery plans will require staff reductions. At the proposed level of funding of \$7,606,000, this office will lose three full-time equivalent positions, which will leave a significant impact on our ability to provide coverage of agency operations.

We are also requesting the following changes to both our appropriations law and oversight authority:

- The prohibition relating to the use of funds for any audit, investigation or review of the Railroad Medicare program does not permit this office to fulfill its statutory oversight responsibilities for a major agency program. Removal of the current restriction would be consistent with Administration and Congressional priorities to reduce Medicare fraud.
- We have identified the agency's oversight of the National Railroad
 Retirement Investment Trust as a serious management challenge for
 the RRB. We request oversight and enforcement authority be granted
 to the OIG to conduct audits and investigations of this body which
 holds investments of more than \$30.6 billion in trust funds.
- Current appropriations laws require this office to reimburse the RRB for indirect costs that include office space, equipment, communications, supplies, maintenance and administrative services. This process requires the use of agency and OIG resources for reconciliation and accounting that could be better utilized for improving agency operations. Removal of the current language would permit negotiations between the RRB and OIG for a more efficient way to address the issue of support costs.

This office will use all available resources to improve agency program operations, to reduce fraud against agency benefit programs, and to ensure the RRB provides the highest level of service to its constituents. Thank you for your consideration.

Sincerely,

Martin J. Dickman Inspector General

Enclosure



UNITED STATES RAILROAD RETIREMENT BOARD

OFFICE OF INSPECTOR GENERAL

September 5, 2007

The Honorable Richard B. Cheney President of the Senate 276 Dwight D. Eisenhower Executive Office Building Washington, D.C. 20503

RE: Railroad Retirement Board - Office of Inspector General FY 2009 Budget Request

Dear Mr. Cheney:

We are respectfully submitting the budget request for the Railroad Retirement Board - Office of Inspector General (RRB-OIG), for fiscal year (FY) 2009. This request, prepared in compliance with Office of Management and Budget Circular No. A-11, is being submitted concurrently to the Congress.

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- We have identified the agency's oversight of the National Railroad Retirement Investment Trust as a serious management challenge for the RRB. We request oversight and enforcement authority be granted to the OIG to conduct audits and investigations of this body which holds investments of more than \$30.6 billion in trust funds.
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Martin J. Dickman Inspector General

Enclosure

cc: Honorable Robert C. Byrd Chairman, Committee on Appropriations

Honorable Thad Cochran Ranking Member, Committee on Appropriations

Honorable Tom Harkin Chairman, Subcommittee on Labor, Health and Human Services and Education

Honorable Arlen Specter Ranking Minority Member, Subcommittee on Labor, Health and Human Services and Education



UNITED STATES RAILROAD RETIREMENT BOARD

OFFICE OF INSPECTOR GENERAL

September 5, 2007

The Honorable Nancy Pelosi Speaker of the U.S. House of Representatives Office of the Speaker H-232, U.S. Capitol Washington, D.C. 20515

RE: Railroad Retirement Board - Office of Inspector General FY 2009 Budget Request

Dear Madame Speaker:

We are respectfully submitting the budget request for the Railroad Retirement Board - Office of Inspector General (RRB-OIG), for fiscal year (FY) 2009. This request, prepared in compliance with Office of Management and Budget Circular No. A-11, is being submitted concurrently to the Congress.

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Sincerely,

Martin J. Dickman Inspector General

Enclosure

cc: Honorable Dave Obey

Chairman, Committee on Appropriations

Honorable Jerry Lewis
Ranking Member, Committee on Appropriations

Honorable James T. Walsh Ranking Member, Subcommittee on Labor, Health and Human Services, Education and Related Agencies

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PROPOSED APPROPRIATION LANGUAGE

Limitation on the Office of Inspector General

For expenses necessary for the Office of Inspector General for audit, investigatory and review activities, as authorized by the Inspector General Act of 1978, as amended, not more than [\$7,172,686] \$7,606,000, to be derived from the railroad retirement accounts and railroad unemployment insurance account: *Provided:* That funds made available under this Act, or subsequent Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Acts, may be used for any audit, investigation, or review of the Medicare Program.

Provided further, That the Railroad Retirement Board, Office of Inspector General is authorized to conduct audits and investigations of the National Railroad Retirement Investment Trust and that the enforcement provisions in Section 105 of Public Law 107-90 are extended to the Railroad Retirement Board, Office of Inspector General.

OFFICE OF INSPECTOR GENERAL RAILROAD RETIREMENT BOARD

Budget Account - Limitation on the Office of Inspector General (60-8018-0-7-601)

Administrative Appropriation Request by Limitation Account and Budget Request Level (in thousands of dollars)

Limitation Account	FY 2009 GUIDANCE LEVEL	FY 2009 AGENCY REQUEST
Limitation on the Office of Inspector General	7,606	8,241
Full-time Equivalent Employment (FTEs) (Work Years)	50	53

NOTE:

Salary and Benefit funding reflect staff reductions as funds are allocated to meet mandated agency responsibilities; i.e., Disaster Recovery contract, FISMA Review contract, and contract for the audit of Statement of Social Insurance.

OFFICE OF INSPECTOR GENERAL RAILROAD RETIREMENT BOARD Budget Account - Limitation on the Office of Inspector General (60-8018-0-7-601)

FY 2009 Budget Request Level By Appropriation and Object Class Analysis of Appropriation and Object Class (in thousands of dollars)

	FY 2007 CURRENT APPROPRIATION	FY 2008 ADMINISTRATION AND HOUSE PROPOSED	FY 2008 SENATE PROPOSED	FY 2009 GUIDANCE LEVEL	FY 2009 AGENCY REQUEST
OMB OBJECT CLASS					
PERSONNEL COMPENSATION:					
11.1 Full-Time Permanent	4,898	5,202	5,325	5,126 ^{1/}	5,413
11.3 Other Than Full-Time Permanent	0	0	0	0	0
11.5 Other Personnel Compensation	111	101	101	103	113
11.9 Total Personnel Compensation	5,009	5,303	5,426	5,229	5,526
12.0 Personnel Benefits: Civilian	1,368	1,509	1,589	1,477 1/	1,585
13.0 Benefits for Former Personnel	0	0	0	87 1/	1
21.0 Travel and Transportation	178	195	260	205	307
22.0 Transportation of Things	4	5	5	5	6
23.0 Communications, Utilities and Rent	367	375	375	377	384
24.0 Printing and Reproduction	7	3	3	3	4
25.0 Other Services	188	190	236	198	359
26.0 Supplies and Materials	21	16	16	15	40
31.0 Equipment	30	10	90	10	105
TOTAL OIG DIRECT OBLIGATIONS	7,172	7,606	8,000	7,606	8,317
REIMBURSABLE OBLIGATIONS	0	0	0	0	0
TOTAL OIG OBLIGATIONS	7,172	7,606	8,000	7,606	8,317
LIMITATION ON ADMINISTRATION	7,172	7,606	8,000	7,606	8,317
OIG FUNDED FTE ALLOCATION	53	53	55	50	53

NOTE:

Salary and benefit estimates for fiscal years 2008 and 2009 reflect assumptions provided by the Office of Management and Budget for cost of living/locality increases of 3,0% in January 2007 and January 2008.

Salary and Benefit funding reflect staff reductions as funds are allocated to meet mandated agency responsibilities; i.e., Disaster Recovery contract, FISMA Review contract, and contract for the audit of Statement of Social Insurance.

OFFICE OF INSPECTOR GENERAL RAILROAD RETIREMENT BOARD Budget Account - Limitation on the Office of Inspector General (60-8018-0-7-601)

Analysis of Resources (in thousands of dollars)

	FY 2007 CURRENT APPROPRIATION	FY 2008 ADMINISTRATION AND HOUSE PROPOSED	FY 2008 SENATE PROPOSED	FY 2009 GUIDANCE LEVEL	FY 2009 AGENCY REQUEST
Budget Authority	7,172	7,606	8,000	7,606	8,317
Outlays	7,172	7,606	8,000	7,606	8,317
Full-time equivalent employment (Work Years): Total Funded		53	55	50	53
	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014
Budget Authority: Agency Request	7,606	7,606	7,606	7,606	7,606
Outlays: Agency Request	7,606	7,606	7,606	7,606	7,606

OFFICE OF INSPECTOR GENERAL RAILROAD RETIREMENT BOARD

Budget Account - Limitation on the Office of Inspector General (60-8018-0-7-601)

Relationship of Programs to Account Structure

Programs by Bureau and Account Budget Authority

		2009 ICE LEVEL		2009 REQUEST
60-8018-0-7-601 Limitation on the Office of Inspector General	BA	OUTLAYS	BA	OUTLAYS
Office of Inspector General Appropriation Request	7,606 7,606	7,606 7,606	8,317 8,317	8,317 8,317
Full-time Equivalent Employment (Work Years)		50		53

NOTE:

Salary and Benefit funding reflect staff reductions as funds are allocated to meet mandated agency responsibilities; i.e., Disaster Recovery contract, FISMA Review contract, and contract for the audit of Statement of Social Insurance.

OFFICE OF INSPECTOR GENERAL RAILROAD RETIREMENT BOARD Budget Account - Limitation on the Office of Inspector General (60-8018-0-7-601)

Full-Time Equivalent Staff By Grade

PERSONNEL SERIES	GRADE LEVEL	FY 2007 CURRENT APPROPRIATION	FY 2008 ADMINISTRATION AND HOUSE PROPOSED	FY 2008 SENATE PROPOSED 1/	FY 2009 GUIDANCE LEVEL	FY 2009 AGENCY 1/ REQUEST
Executive	EX-IV	1	1	1	1	1
Senior Executive Service	SES	2	1	1	2	2
General Schedule	GS-15 GS-14 GS-13 GS-12 GS-11 GS-10	2 6 14 16 0	3 5 14 16 3 0	3 5 14 16 3 0	2 5 14 19 1	2 5 14 19 2 0
	GS-09 GS-08 GS-07 GS-06 GS-05 GS-04	6 2 3 1 0	4 2 3 1 0	4 2 5 1 0	0 2 3 1 0	2 2 3 1 0
TOTAL FTEs FUNDED		53	53	55	50	53

NOTE:

Salary and Benefit funding reflect staff reductions as funds are allocated to meet mandated agency responsibilities; i.e., Disaster Recovery contract, FISMA Review contract, and contract for the audit of Statement of Social Insurance.

OFFICE OF INSPECTOR GENERAL RAILROAD RETIREMENT BOARD

EXPLANATION OF FISCAL YEAR 2009 REQUEST

The Office of Inspector General (OIG) at the Railroad Retirement Board (RRB) is responsible for promoting economy, efficiency and effectiveness; and for identifying and preventing fraud, waste and abuse in agency programs. The RRB administers comprehensive retirement-survivor and unemployment-sickness insurance benefit programs for the nation's railroad workers and their families. In Fiscal Year (FY) 2006, the agency paid \$9.5 billion in retirement and survivor benefits to about 619,000 beneficiaries, and \$72.9 million in net unemployment and sickness insurance benefits to about 29,300 claimants. The RRB also administers the Medicare Part B Program, the physician services aspect of the Medicare program, for qualified railroad beneficiaries. In FY 2006, the RRB paid annual Medicare benefits of approximately \$901 million to some 539,000 retired and disabled railroad workers.

The OIG conducts audits, management reviews, inspections of RRB program operations, and provides recommendations for improvement to agency management. The OIG also identifies and investigates cases of waste, fraud and abuse in RRB programs; and makes referrals for prosecution and monetary recovery actions.

The Annual Performance Plan for FY 2009, including the President=s proposed administrative budget and projected performance statistics for FYs 2007-2009, is incorporated in this budget request.

The OIG is requesting \$7,606,000 for FY 2009 to conduct its independent oversight of agency operations. The OIG will continue its efforts to perform fraud investigations, identify operational weaknesses and detect internal control deficiencies in RRB benefit programs. OIG will also continue its work with agency managers to ensure implementation of corrective actions.

Requested Changes in Operational Authority

Oversight of Medicare-related activities

The agency is responsible for the administration of Medicare program activities such as enrollment, premium collection, answering beneficiary inquiries, and conducting the annual Carrier Performance Evaluation of the Medicare carrier. The current prohibition does not allow the use of funds appropriated for the OIG to be used for any audit, investigation, or review of the Railroad Medicare program. This prohibition does not permit OIG to fulfill its statutory oversight responsibilities for a major agency program. The OIG respectfully requests the removal of the current prohibition. Removal of the prohibition would benefit both the RRB and its constituents, and would be consistent with priorities established by the Administration and the Congress to reduce fraud in one of the largest Federal programs.

Oversight of the National Railroad Retirement Investment Trust (NRRIT)

The NRRIT was established by the Railroad Retirement and Survivors' Act of 2001 (RRSA) to manage and invest Railroad Retirement assets. The trust funds currently total approximately \$30.6 billion. Although the Trust is a tax-exempt entity independent of the Federal Government, RRSA requires the Trust to report to the RRB. This office has previously reported concerns about RRB=s passive relationship with the NRRIT and has identified the RRB's oversight in this area as a serious management challenge. However, RRSA failed to provide the OIG with oversight authority to conduct audits and investigations of the NRRIT. This office believes that independent oversight of the Trust's operations is necessary to ensure sufficient reporting mechanisms and to ensure that the Trustees are fulfilling their fiduciary responsibilities. The OIG respectfully requests oversight and enforcement authority to conduct audits and investigations of the NRRIT.

Reimbursement of Indirect Costs to the Railroad Retirement Board

This office is the only Federal OIG that cannot negotiate a service level agreement with its parent agency. The current mandate has resulted in a burdensome accounting and reconciliation process for both the agency and the OIG.

OIG respectfully requests the removal of appropriation language that mandates OIG reimbursement to the agency for indirect costs such as office space, equipment, communications, office supplies, maintenance and administrative services. Removal of the current language would permit negotiations between RRB and OIG for a more efficient way to address the issue of support costs.

The Office of Inspector General conducts its operations through two major components: the Office of Audit and the Office of Investigations. A discussion of the priority areas in FY 2009 for audit and investigative activities follows.

OFFICE OF AUDIT

The mission of the Office of Audit (OA) is to conduct reviews, identify operational weaknesses and potential cost savings, and recommend corrective actions to strengthen agency programs.

OA works to ensure that RRB's benefit programs are operating effectively and efficiently. OA also ensures that Congress and the Board members are informed of current and potential problems, as well as management's progress in implementing necessary corrective actions to address identified weaknesses. OA conducts financial, performance and compliance audits as well as evaluations of agency actions in response to the requirements of new legislation and regulations.

In FY 2009, OA will focus on areas that support national initiatives and priorities as well as those operational areas with the greatest impact on RRB activities including goals set forth in the President's Management Agenda. Consistent with the agency's central mission to pay accurate and timely benefits, OA concentrates its efforts on the systems and processes that support the benefit payment programs and stewardship over the assets that fund those programs.

OA will continue to perform audits that support the agency's strategic goal of financial accountability and stewardship, including the annual audit of the RRB's financial statements. In FY 2009, OA auditors will complete the audit of the RRB's FY 2008 financial statements and begin the audit of the FY 2009 statements. To perform these audits, OA will contract for the assistance of a consulting actuary in auditing the statement of social insurance which is now a basic financial statement.

OA will also work with agency management to ensure that the RRB's financial reporting responsibilities are adequately supported by detailed, verifiable information from the NRRIT. As discussed previously, this office seeks oversight authority for

the activities of that entity to ensure the accuracy and timeliness of financial reporting.

OA will also focus on providing oversight to the RRB's efforts to ensure the privacy and security of its electronic and non-electronic information. We will evaluate agency performance in context of the goals established in its Strategic Plan and the mandates and challenges laid out in Federal law and related guidance including the Information Technology Management Reform Act, the E-Government Act of 2002, the Federal Information Security Management Act of 2002 (FISMA), and the Privacy Act. Our work will be targeted toward the identification and elimination of security deficiencies and system vulnerabilities including controls over sensitive personally identifiable information.

OFFICE OF INVESTIGATIONS

The Office of Investigations (OI) focuses its efforts on identifying, investigating and presenting cases for prosecution, throughout the United States, concerning fraud in RRB benefit programs. OI conducts investigations relating to the fraudulent receipt of RRB sickness, unemployment, disability or retirement benefits. OI also investigates railroad employers and unions when there is an indication that they have submitted false reports to the RRB. Investigative efforts can result in criminal convictions, administrative sanctions, civil penalties and the recovery of program benefit funds.

OI initiates cases based on information from a variety of sources. The agency conducts computer matching of wage information reported to state governments and RRB benefits paid. Referrals are made to OI if a match is found. OI also receives allegations of fraud through the OIG Hotline, contacts with state, local and Federal agencies, and information developed through audits conducted by the OIG=s Office of Audit.

OI=s investigative results for the first ten months of FY 2007 are:

Civil Judgements	Indictments/Informations	Convictions	Recoveries/Collections
22	20	41	\$4,408,208

OI anticipates an ongoing caseload of approximately 450 investigations in FY 2008. During the first 10 months of FY 2007, OI opened 224 new cases and closed 262. At present, OI has cases open in 47 states, the District of Columbia and Canada with estimated fraud losses totaling more than \$11 million.

OI will concentrate its resources on cases with the highest fraud losses that usually involve cases related to the RRB=s disability and retirement programs. Disability fraud cases currently constitute approximately 49% of OI=s total caseload. These cases involve more complicated schemes and result in the recovery of substantial funds for the agency=s trust funds. OI will continue to dedicate considerable time and resources in the investigation of nationwide schemes to defraud the RRB disability program. These cases require sizeable resources for travel by special agents to conduct surveillance, or more sophisticated investigative techniques and numerous witness interviews. The schemes are often complex and, in some cases, include conspiratorial involvement by attorneys. The cases also require very sophisticated financial analysis since the schemes are often cloaked in what could appear to be legitimate business practices.

OI will also continue to investigate fraud violations of railroad employees collecting unemployment or sickness insurance benefits while working and receiving wages from an employer. OI will also investigate retirement fraud which typically involves the theft and fraudulent cashing of U.S. Treasury checks or the withdrawal of electronically deposited RRB benefits. OI will also use the Department of Justice's Affirmative Civil Enforcement Program to recover trust fund monies from cases that do not meet U.S. Attorney's guidelines for criminal prosecution.

In FY 2009, OI will continue to coordinate its efforts with agency program managers to address vulnerabilities in benefit programs that allow fraudulent activity to occur

proactive projects to identify fraud matters that are not detected through the agency=s program policing mechanisms. Findings will be conveyed to agency management through OIG systemic implication reports to alert officials of operational weaknesses that may result in fraud against RRB programs. OI will also continue to work with RRB program managers to ensure the appropriate and timely referral of all fraud matters to the OIG.

OI will also investigate complaints involving administrative irregularities and any alleged misconduct by agency employees.

The removal of the prohibition of Medicare-related activities, as discussed above, will permit OI to conduct investigations related to this important program. The need for the restoration of OIG's Medicare oversight activities is supported by the high level of Medicare fraud, identified by other oversight reviewers, and the significant amount of money involved in the Railroad Medicare program.

Conclusion

In FY 2009, the OIG will continue to focus its resources on the review and improvement of RRB operations and will conduct activities to ensure the integrity of the agency trust funds. This office will continue to work with agency officials to ensure the agency is providing quality service to railroad workers and their families. The OIG will also aggressively pursue all individuals who engage in activities to fraudulently receive RRB funds.

Railroad Retirement Board – Office of Inspector General FY 2009 Annual Performance Plan	2004 Actual (\$6.56m)	2005 Actual (\$7.196m)	2006 Actual (\$7.124m)	2007 Continuing Resolution Level (\$7.124m)	2008 Request Level (\$7.606m)	2009 Request Level (\$7.606m)
Performance Goal I: Add value to the agency's	programs and	operations the	ough audits and	d evaluations.		
The OIG will solicit suggestions for audits and reviews for the annual audit work plan from 100% of the agency's organizational components.	100%	100%	100%	100%	100%	100%
Seventy-five percent of audit reports will be ssued within 240 days.	67%	91%	75%	75%	75%	75%
Eighty percent of audits, evaluations, and inspections are subjected to an internal quality assurance review.	60%	70%	75%	80%	80%	80%
Agency management agrees with 80% of recommendations made in audit, evaluation, and inspection reports.	97%	89%	94%	80%	80%	80%
Performance Goal II: Provide accurate, objective	e and timely i	nformation to t	he RRB, Congre	ss and other interested	l parties.	
The OIG will file 100% of reports on time, and acknowledge 100% of requests for information within three working days.	100%	100%	100%	100%	100%	100%
	100%	100%	100%	100%	100%	100%
Performance Goal III: The OIG's work will deter	fraud and abu	ise in agency p	rograms and fo	ster integrity in its oper	ration.	
The OIG will increase the number of convictions, civil judgements and administrative actions resulting from its investigative case work by 10% over the FY 2000 base of 112.	-29%	10%	10%	_		-
The OIG will increase the amount of monetary accomplishments by 10% over the FY 2000 base of \$3.9 million.	476%	10%	10%	-		-
The OIG will complete 4 projects to identify fraud cases that are not detected through agency policing procedures.	3	3	3	4	4	3
Percentage of allegations that are evaluated and submitted for disposition within 30 days of receipt.	_	90%	90%	70%	90%	85%

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Railroad Retirement Board – Office of Inspector General FY 2009 Annual Performance Plan	2004 Actual (\$6.56m)	2005 Actual (\$7.196m)	2006 Actual (\$7.124m)	2007 Continuing Resolution Level (\$7.124m)	2008 Request Level (\$7.606m)	2009 Request Level (\$7.606m)
Percentage of investigations that are accepted by a prosecutor or an agency for judicial or administrative action that result in a successful action, i.e., criminal conviction, civil judgment or administrative action.	-	95%	90%	75%	90%	85%
Percentage of systemic issue recommendations hat are agreed to by the agency in the current		500/	200/	700/	050/	0001
year. Performance Goal IV: Promote cooperative rel	ationshine with	50%	80%	70%	95%	90%
The OIG will work 10% on average, of its cases	anonompo witi	Taris INIXD and C	outer lead al, su	ate and local agencies	and departments.	
as joint investigations with other OIGs, and 8% as joint investigations with other Federal investigative agencies.	OIG 4% OLE 8%	OIG 4% OLE 8%	_		_	_
The OIG will conduct 4 training sessions during he year for RRB staff.	1	2	2	1	4	3
Performance Goal V: Conduct timely follow-up	on prosecutio	ns and correct	ive actions.			(4) [1] [1] [1] [1] [1] [1] [1] [1] [1] [1]
Eighty percent of all OIG investigations will be eferred for prosecution or administrative action to later than nine months after initiation.	82%	75%	_	_	<u>.</u>	_
Reports on the progress of corrective actions for audit recommendations will be issued to the RRB Chairman within 35 days of the six month reporting period.	27 days	26 days	22 days	35 days	30 days	35 days
Performance Goal VI: The OIG will ensure an e	conomical and	efficient opera	ition.			
All auditors hold the appropriate credentials to satisfy government, PCIE and applicable standards.	100%	100%	100%	100%	100%	100%
All auditors will receive 80 hours of continuing professional education over 2 years.	100%	100%	100%	100%	100%	100%
Percentage of responses to completed case surveys indicating an evaluation of full satisfaction or higher regarding OIG envestigative products.	_	100%	92%	75%	90%	90%