

INSPECTOR GENERAL



NATIONAL LABOR RELATIONS BOARD

WASHINGTON, DC 20570

I hereby submit this Semiannual Report: October 1, 2006 – March 31, 2007, which summarizes the major activities and accomplishments of the Office of Inspector General (OIG) of the National Labor Relations Board (Agency). The submission of this report is in accordance with the Inspector General Act of 1978, as amended (IG Act). Section 5 of the IG Act requires that the Chairman transmit this report to the appropriate committees or subcommittees of the Congress within 30 days of its receipt.

In the audit program, OIG issued three audit reports and one issue alert. In the investigations program, OIG processed 105 contacts, initiated 9 cases, and closed 7 cases. The investigations resulted in three resignations, two suspensions, \$296 in investigative recoveries, and four referrals to the Department of Justice. We reviewed six pieces of legislation. Details on these accomplishments can be found in the body of this report.

Procurement has been a major issue throughout the Federal government including major findings at this Agency. Last period, we issued an audit report, *Information Technology Procurement Actions*, which contained numerous findings. This period, we conducted an audit to evaluate the process for goods and services and found similar weaknesses. An investigation identified two Antideficiency Act violations. Procurement is a rapidly evolving and growing sector of the Federal government and we will continue to work with the Agency to ensure that it is prepared to properly expend contract funds.

I appreciate the support of all Agency employees in achieving the accomplishments set forth in this report.

A handwritten signature in cursive script that reads "Jane E. Altenhofen".

Jane E. Altenhofen
April 30, 2007

AGENCY PROFILE

The National Labor Relations Board (NLRB or Agency) is an independent Federal agency established in 1935 to administer the National Labor Relations Act (NLRA). The NLRA is the principal labor relations law of the United States, and its provisions generally apply to private sector enterprises engaged in, or to activities affecting, interstate commerce. NLRB jurisdiction includes the U.S. Postal Service (other government entities, railroads, and airlines are not within NLRB's jurisdiction).

The NLRB seeks to serve the public interest by reducing interruptions in commerce caused by industrial strife. It does this by providing orderly processes for protecting and implementing the respective rights of employees, employers, and unions in their relations with one another. The NLRB has two principal functions: (1) to determine and implement, through secret ballot elections, the free democratic choice by employees as to whether they wish to be

represented by a union in dealing with their employers and, if so, by which union; and (2) to prevent and remedy unlawful acts, called unfair labor practices, by either employers or unions.

NLRB authority is divided by law and delegation. The five-member Board primarily acts as a quasi-judicial body in deciding cases on formal records. The General Counsel investigates and prosecutes unfair labor practices before administrative law judges, whose decisions may be appealed to the Board; and, on behalf of the Board, conducts secret ballot elections to determine whether employees wish to be represented by a union.

The Board consists of the Chairman and four Members who are appointed by the President with the advice and consent of the Senate. Board Members serve staggered terms of 5 years each. The General Counsel is also appointed by the President with the advice and consent of the Senate and serves a 4-year term.

The present Board Members and General Counsel have served throughout this reporting period.

The NLRB received an appropriation of \$251,507,470 for Fiscal Year (FY) 2007 to fund a ceiling of 1,755 full-time equivalents. NLRB Headquarters is at 1099 14th Street, NW, Washington, DC.

In addition to the Headquarters building, employees are located in 51 field offices

throughout the country. Three satellite offices for the Administrative Law Judges are located in Atlanta, San Francisco, and New York City. Since October 2, 2000, field offices have included 32 Regional Offices, 16 Resident Offices, and 3 Subregional Offices.

Additional information about the NLRB can be found on the Web site www.NLRB.gov.

OFFICE OF INSPECTOR GENERAL

NLRB established the Office of Inspector General (OIG) pursuant to the 1988 amendments to the Inspector General Act of 1978 (IG Act).

Resources

The FY 2007 OIG budget is \$1,146,700 for operations, of which \$185,000 is for contract services. In addition to the Inspector General, the OIG consists of a Counsel/Assistant Inspector General for Investigations, Assistant Inspector General for Audits, three auditors (one currently vacant), and a staff assistant.

William A. Garay, an OIG Lead Auditor, retired December 27, 2006.

OIG had agreed to leave the Investigator position vacant in FY 2006 to help with an Agency budget crisis, and was researching how to rewrite the position

description to include computer forensics and other needed information technology skills. In December 2006, the Inspector General (IG) was told that the Agency was reducing its full-time equivalents (FTE) and that the OIG needed to reduce its FTE level by one. The IG chose to eliminate the FTE that was occupied by the investigator position.

There was also discussion regarding whether the Lead Auditor position was necessary. The Chairman determined that the Lead Auditor position could be filled. Hiring a replacement for the Lead Auditor was delayed several months.

The Inspector General is to provide policy direction for and is to conduct, supervise, and coordinate audits relating to program operations of the Agency. *OIG issued three audit reports and one issue alert.*

Reports Issued

- We issued Audit Report
OIG-F-11-07-01, *Audit of the NLRB
Fiscal Year 2006 Financial Statements*,
on December 14, 2006.

The audit, performed by Carmichael, Brasher, Tuvell & Company (CBTC), an independent public accounting firm, found that NLRB's FY 2006 Financial Statements were fairly stated. No material weaknesses in controls over financial reporting were identified. In addition, no instances of non-compliance with laws and regulations required to be reported by Government Auditing Standards or the Office of Management and Budget (OMB) were identified.

CBTC's Report on Internal Control identified one reportable condition. The Agency has not implemented a disaster recovery plan.

A management letter identified four other areas in which management could improve controls or operating effectiveness. These included information technology (IT) security, major systems development capitalization, and property accounting.

Management generally agreed with two of the four findings and related recommendations made in the Management Letter. The Chief Information Officer agreed with most of our IT security findings, but disagreed that improvements would be neither labor nor resource intensive to implement. Management disagreed with our conclusion that it was inappropriate to obligate FY 2006 funds for subscription contracts that were entirely for FY 2007 services. As part of a later audit, we agreed that guidance is not clear and consistent on this issue.

- We issued Audit Report
OIG-AMR-54-07-01, *Impact Analysis*,
on March 12, 2007. This audit evaluated
the current usefulness of the Impact
Analysis Program.

Impact Analysis was established in 1995
to provide for prioritization of cases
based on public impact and to ensure
that those cases that require prompt
resolution receive sufficient resources
and the Agency's best efforts. As
initially proposed, cases were divided
into three categories, all with longer
timeframes than the previous one of 45
days from receipt of an unfair labor
practice case to disposition.

Although caseload and staffing
parameters have changed significantly
since Impact Analysis was initiated, the
program remains a logical mechanism to
manage the Regional Office caseload.
The program is broadly supported by
managers and employees and is not
administratively burdensome.

The percentage of cases not meeting
performance goals has decreased since
Impact Analysis was initiated. We
believe several factors unrelated to
Board agent efficiency made the
performance goals more attainable.
These factors include excusing a large
number of overage cases, a shrinking
caseload, and increasing the timeframes
for completing a case.

Management generally agreed with our
findings. We had no recommendations,
although we noted that managing to the
Impact Analysis due date had a positive
impact on the timely completion of
cases.

- We issued Audit Report
OIG-AMR-52-07-02, *Procurement
Actions*, on March 26, 2007. We
conducted this audit to evaluate the
process for the procurement of goods
and services.

Most of the 25 contracts reviewed had
some aspect that was not in conformance

with the Federal Acquisition Regulation or Federal appropriations law. The non-conformances dealt with all aspects of the process including planning, awarding the contract, and monitoring contractor performance.

Three contracts were entered into between 1 and 3 days before assurance that funds were available and were not contingent on the availability of funds. The Agency increases the risk of exceeding its appropriation if funds availability is not determined before entering into a contract.

Seven contracts in our sample involved Agency personnel accepting goods or services prior to the existence of the contracts, thereby creating unauthorized commitments. These contracts were also not properly ratified. For four contracts, the contract files contained no evidence that market research was completed. A labor-hour contract was executed for mailroom operations even though

information was available to estimate the extent and duration of the work and anticipate costs.

Two contracts reviewed involved the Agency spending more than was needed to meet the identified need or contractual obligation. In a contract for mailroom services, the Agency used the wrong Federal Supply Schedule costing the Agency approximately \$174,000 for the first 3 years of the contract.

Approximately \$342,000 could be put to better use for the remaining 4 option years if the recommended corrective action is taken. In a contract for technical space planning and design services, the Agency paid a contractor \$1,150 for lunch breaks.

Management agreed with several recommendations and changed an incorrectly recorded payment of \$3,892.50. Management disagreed with several findings. We emphasized that our recommendations could save the Agency substantial amounts.

- We released Issue Alert OIG-IA-07-01, *Top Management and Performance Challenges*, on October 12, 2006. The OIG developed a list of what it considers to be the most serious management and performance challenges facing the NLRB. They are:
 1. Reduce the Board's pending caseload to meet performance goals;
 2. Comply with Privacy Act system notice requirements;
 3. Develop, implement, and test an IT contingency plan;
 4. Implement e-government initiatives to effectively communicate with parties and the public;
 5. Strengthen control over employees' use of the Agency information technology assets;
 6. Manage the Agency during periods of budgetary constraints;
 7. Ensure compliance with the Federal Acquisition Regulation; and
 8. Provide sufficient protection of sensitive and Personally Identifiable Information.

- OMB Circular A-123, revised in February 2006, states that charge card managers should implement internal controls that mitigate charge card risks. In September 2002, we completed an audit of travel and purchase cards. We made multiple recommendations to improve management oversight of the programs.

This period, we determined whether management effectively implemented the recommendations and other internal controls. For travel cards, actions included blocking certain codes and reviewing monthly transaction reports. The Finance Chief contacts the employee, the supervisor, and the NLRB Special Counsel as appropriate. If deemed necessary, Finance refers the employees to us for investigation. Overall, we found that the recommendations had been implemented effectively and management was adequately mitigating risks of misuse and/or delinquency.

Audit Follow-up

Agreed upon actions were not completed within 1 year on four audit reports. Two of these reports are now closed.

- *Audit of the NLRB Fiscal Year 2004 Financial Statements*, OIG-F-9-05-01, was issued on December 22, 2004, and we reached agreement with management on that date. Recommendations were made to the Chief Information Officer (CIO) and the Director of Administration.

The CIO reported that action was completed on the recommendation to implement a disaster recovery plan in accordance with National Institute of Standards and Technology standards on November 2, 2006. The plan was reviewed and deemed implemented by OIG contract auditors in March 2007.

The final open recommendation to the Division of Administration has yet to be completed. The issue will be reviewed as part of the current audit of the FY 2007 financial statements.

- *Audit of the NLRB Fiscal Year 2005 Financial Statements*, OIG-F-10-06-01, was issued on December 16, 2005, and we reached agreement with management on that date. Recommendations to the CIO were the same as those made in the FY 2004 Financial Statement audit discussed above. We closed the audit report on April 9, 2007.

- *Non-Standard Work Hours Compensation*, OIG-AMR-47-05-04, was issued on August 9, 2005, and we reached agreement with management on that date. Action was completed on four recommendations. Little measurable progress was made in implementing the remaining three recommendations during the past 6 months.

- *Safeguarding Social Security Numbers*, OIG-AMR-48-05-05, was issued on August 31, 2005, and we reached agreement on that date. Action was completed on the final open recommendation. We closed the audit report on February 9, 2007.

INVESTIGATIONS PROGRAM

The Inspector General is to provide policy direction for and is to conduct, supervise, and coordinate investigations relating to the programs and operations of the Agency. *OIG processed 105 contacts, initiated 9 cases, and closed 7 cases. The investigations resulted in three resignations, two suspensions, \$296 in investigative recoveries, and four referrals to the Department of Justice.*

Case Workload		Contacts Processed	
Open (10/1/2006)	10	Received	105
Initiated	9	Initiated Investigation	0
Closed	7	Opened Case -- Referred to Agency	0
Open (3/31/2007)	12	Non-Investigative Disposition	105

- **Misuse of Cellular Telephone.**

OIG initiated this case after receiving a report that a contract employee misused an Agency issued cellular telephone.

After documenting the misuse through a review of the cellular telephone records, we confronted the contract employee who admitted to the misuse and agreed to reimburse the Agency.

When the contract employee failed to provide the promised reimbursement, we issued a report to the Chief, Procurement and Facilities Branch, recommending that she consider seeking reimbursement from the contractor. After the contract

employee resigned her employment, the contractor reimbursed the Agency in the amount of \$296. (OIG-I-395)

- **Misuse of the Internet.** OIG initiated this case after receiving a report that the subject received sexually graphic digital video disks (DVDs) at work. Through a subpoena, we obtained information to substantiate that the subject ordered sexually graphic DVDs and that he directed the company to ship them to his work address. We conducted a forensic review of the hard drive from the subject's Government computer.

That review disclosed that sexually explicit material was viewed by the subject in late 2004. The subject also purchased and downloaded software that purports to eliminate all traces of his Internet browsing activity. The subject resigned from the Agency after he was contacted for an interview. (OIG-I-289)

- **Antideficiency Act and False Statements.** OIG initiated this case after an auditor discovered that the subject backdated a contract. The investigation involved obtaining information from the contracts that were executed in September and October 2006 and interviews of the Agency's procurement staff.

We substantiated the allegation against the subject as well as finding other instances of backdating contracts. We also substantiated two Antideficiency Act violations. The local U.S. Attorney's Office declined prosecution. The subject resigned prior to the OIG issuing a report. We notified the

Chairman about the Antideficiency Act violations that will be addressed separately from this investigation. (OIG-I-399)

- **Failure to Follow Orders.** At the request of Agency management, OIG initiated a case involving a subject who failed to follow orders of her supervisor regarding remaining in the office after the end of her scheduled workday. Our investigative efforts consisted of reviewing Internet logs and interviewing the subject. After we substantiated the allegation, the subject received a 5-day suspension. (OIG-I-396)

- **Travel Card Misuse.** As previously reported, OIG initiated a case following a proactive review of the transactions for the CitiBank Travel Card. During that review, we identified what appeared to be \$1,140 in cash advances that were not related to official travel. When interviewed, the subject admitted that he engaged in this misconduct. During this reporting period, the subject received a 3-day suspension. (OIG-I-397)

- **Mail Fraud.** OIG initiated this case after receiving information that the subject may have engaged in mail fraud by using the U.S. mail to send fraudulent documents to a third party. The documents involved providing information regarding the subject's position with the Agency. We referred our investigative findings to the local U.S. Attorney's Office, who is now reviewing the matter. (OIG-I-398)

- **Attorney Misconduct.** OIG initiated this case after learning that an attorney copied the trial notes of an opposing counsel without permission and then was instructed by two management level attorneys to destroy the notes without notifying the opposing counsel or the administrative law judge.

We substantiated the allegation. Because this allegation involved the obstruction of justice, we notified the local U.S. Attorney's Office. Prosecution of the three subjects was declined. Agency managers are considering disciplinary action. The Agency also forwarded the

OIG investigative report to the appropriate state disciplinary authorities for attorney misconduct. (OIG-I-400)

- **False Personation.** OIG initiated this case at the request of the Division of Operations-Management. The allegation involved a person who filed a charge with a Regional Office and then posed as a Field Examiner when he telephonically contacted a potential witness. When confronted, the person admitted to impersonating a Field Examiner. The person then withdrew the charge and the case before the Agency was terminated. The local U.S. Attorney's office declined prosecution. (OIG-I-405)

Hotline

Employees and members of the public with information on fraud, waste, and abuse are encouraged to contact OIG. A log of calls to a nationwide toll free number or the office numbers and a log of mail, e-mail, and facsimile messages are maintained. All information received, regardless of the method used, is referred to as **HOTLINE** contacts.

The information received over the hotline is the basis for the initial review for potential investigations. The information is analyzed to determine if further inquiry is warranted. Most **HOTLINE** contacts are calls from members of the public seeking help on an employment related problem or issues outside OIG and/or Agency jurisdiction.

As appropriate, OIG refers these callers to the Regional Office; local, state, or Federal agency; or private resource to provide assistance.

During this reporting period, OIG received 105 hotline contacts, of which 47 were telephone calls and 58 were in writing.

LEGISLATION, REGULATIONS, AND POLICY

The Inspector General is to review existing and proposed legislation and regulations relating to programs and operations of the Agency and is to make recommendations concerning the impact of such legislation or regulations. Similarly, we review Agency and OIG policy. *We reviewed six pieces of legislation.*

Legislation

We reviewed the following legislation.

H.R. 928, Improving Government

Accountability Act. This legislation would amend the IG Act of 1978 to allow an IG to be removed from office prior to the expiration of his or her term only for certain reasons involving incapacity; inefficiency; neglect of duty; malfeasance; or conviction of a felony or conduct involving moral turpitude.

Establishes the term of office of each IG as 7 years and permits reappointment. It would make similar amendments respecting the appointment of IGs of certain designated Federal entities. The legislation would authorize an IG to annually transmit an appropriation estimate and request to the Director of OMB and to the appropriate congressional committees. It establishes within the Executive Branch the Council of the Inspectors General on Integrity and Efficiency to increase the

professionalism and effectiveness of personnel in IG offices and an Integrity Committee for the Council to review and refer for investigation allegations that are made against IGs and certain staff.

The legislation considers each OIG to be a separate Federal agency and empowers IGs of certain designated Federal entities with the same law enforcement authority provided to other IGs.

S. 680, Accountability in Government

Contracting Act of 2007. In addition to making a variety of changes to the Federal procurement practices, this legislation would make certain changes affecting the IGs. Presidentially appointed IGs who are currently appointed at Level IV of the Executive Schedule would be appointed at Level III. The legislation would also require the appointment of IGs at designated Federal entities without regard to political affiliation and solely on the basis of integrity and demonstrated

ability in accounting, auditing, financial analysis, law, management analysis, public administration, or investigation.

The legislation would require that Congress be notified 15 days before the removal or transfer of an IG at a designated Federal entity. It would also provide certain clarification regarding the authority of an IG to subpoena electronic data and make the Program Fraud Civil Remedies Act applicable to IGs at designated Federal entities.

H.R. 985, Whistleblower Protection Enhancement Act of 2007. This legislation includes as a protected disclosure by a Federal employee any lawful disclosure an employee or applicant reasonably believes is credible evidence of waste, abuse, gross mismanagement, or substantial and specific danger to public health or safety without restriction as to time, place, form, motive, context, or prior disclosure. It codifies the legal standard

for determining whether a whistleblower has a reasonable belief that a disclosure evidences governmental waste, fraud, or abuse, or a violation of law. The legislation allows an employee, former employee, or applicant who seeks corrective action from the Merit Systems Protection Board with respect to an alleged prohibited personnel practice to bring action in Federal district court for de novo review. It also provides that an employee of a covered agency may not be discharged, demoted, or discriminated against as a reprisal for making a disclosure of covered information to an authorized Member of Congress, authorized executive official, or the IG of the covered agency.

H.R. 516, Federal Agency Data Privacy Protection Act. This legislation would require that sensitive data maintained by an agency be encrypted and that the agency IG approve or disapprove any request to transport or access sensitive data to or from a location off Government property.

H.R. 866, Secret Ballot Protection Act.

This legislation would amend the NLRA to make it an unfair labor practice for an employer to recognize or bargain collectively with a labor organization that has not been selected by a majority of the employees in a secret ballot election conducted by the NLRB or for a labor organization to cause or attempt to cause an employer to recognize or bargain collectively with a representative that has not been selected in such manner.

H.R. 800, Employee Free Choice Act of 2007. This legislation would amend the NLRA to require the NLRB to certify a bargaining representative without directing an election if a majority of the bargaining unit employees have authorized designation

of the representative (card-check) and there is no other individual or labor organization currently certified or recognized as the exclusive representative of any of the employees in the unit. It would also revise the enforcement and investigative priority of charges related to union organizing activity. The legislation also adds back pay plus liquidated damages and additional civil penalties to remedies for such violations.

Regulations

The Counsel to the Inspector General is an advisory member of the Agency's Rules Revision Committee that develops changes to the Agency's procedural regulations. During this reporting period, the committee reviewed a proposal to amend the Agency's Freedom of Information Act regulations.

LIAISON ACTIVITIES

The Inspector General is to recommend policies for, and is to conduct, supervise, or coordinate relationships between the Agency and other Federal agencies, state and local governmental agencies, and non-governmental entities. The Inspector General is to give particular regard to the activities of the Comptroller General of the United States. Similarly, we encourage OIG staff members to participate in Agency programs and activities. *OIG staff are active in the inspector general community and Agency functions.*

Inspector General Community

The Inspector General is a member of the Executive Council on Integrity and Efficiency (ECIE), which consists primarily of the inspectors general at the designated Federal entities in the IG Act. She participated in activities sponsored by the President's Council on Integrity and Efficiency (PCIE), which consists primarily of the Presidentially-appointed inspectors general. She was a member of the Audit Committee from May 2001 until January 2007. She became a member of the Legislative Committee in February 2007.

The Assistant Inspector General for Audits, or designated auditors, participated in the Federal Audit Executives Council and the Financial Statement Audit Network.

The Counsel participated in the Council of Counsels to Inspectors General (CCIG). The Counsel continued to participate as a member of a CCIG working group reviewing investigative manuals to identify common areas in which a set of "best practices" could be established. A matrix of "best practices" was issued in November 2006.

Government Accountability Office

The IG Act states that each inspector general shall give particular regard to the activities of the Comptroller General of the United States, as head of the Government Accountability Office (GAO), with a view toward avoiding duplication and ensuring effective coordination and cooperation. No reviews of NLRB are currently ongoing.

GAO issued its annual update of the *Principles of Federal Appropriation Law*, GAO-07-508SP, in March 2007. Based on work done by the NLRB OIG, GAO had issued a decision that the Agency could not remedy an improper obligation by adjusting the contract's

performance period instead of its accounts. The GAO update discusses the opinion involving the NLRB and states that the account adjustment authority cannot be used to alter executed contracts in order to reach expired funds.

INFORMATION REQUIRED BY THE ACT

Certain information and statistics based on the activities accomplished during this period are required by section 5(a) of the IG Act to be included in the semiannual reports. These are set forth below:

Section 5(a)

- (1), (2), (7) OIG did not identify significant problems, abuses or deficiencies relating to the administration of programs. For the purpose of this section, we used the definition of significant as set forth in the Federal Managers' Financial Integrity Act.

- (3) Corrective action has not been completed on all significant recommendations that were described in the previous semiannual reports.

- (4) Four cases were referred to prosecutorial authorities. There were no prosecutions or convictions.

- (5) No reports were made to the Chairman that information or assistance requested by the Inspector General was unreasonably refused or not provided.

- (6) A listing by subject matter is located on page 19.

- (8), (9) No audit reports issued during this period had a recommendation on questioned costs. One audit report issued during this period identified funds that could be put to better use. See Tables 1 and 2.

- (10) There are no audit reports issued before the commencement of the reporting period for which no management decision has been made by the end of the reporting period.

- (11) No significant revised management decisions were made during the reporting period.

- (12) There were no significant management decisions with which I am in disagreement.

AUDIT REPORTS BY SUBJECT MATTER

<u>Report Title and Number</u>	<u>Questioned Costs</u>	<u>Unsupported Costs</u>	<u>Ineligible Costs</u>	<u>Funds To Be Put To Better Use</u>
ADMINISTRATION				
Audit of the NLRB Fiscal Year 2006 Financial Statements				
OIG-F-11-07-01	0	0	0	0
Procurement Actions				
OIG-AMR-52-07-02	0	0	0	\$343,150
FIELD INVESTIGATIONS				
Impact Analysis				
OIG-AMR-54-07-01	0	0	0	0

Table 1**REPORTS WITH QUESTIONED COSTS**

	<u>Number of Reports</u>	<u>Dollar Value</u>	
		<u>Questioned Costs</u>	<u>Unsupported Costs</u>
A. For which no management decision has been made by the commencement of the period	0	0	0
B. Which were issued during the reporting period	0	0	0
Subtotals (A+B)	0	0	0
C. For which a management decision was made during the reporting period	0	0	0
(i) Dollar value of disallowed costs	0	0	0
(ii) Dollar value of costs not disallowed	0	0	0
D. For which no management decision has been made by the end of the reporting period	0	0	0
Reports for which no management decision was made within six months of issuance	0	0	0

REPORTS WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE

Table 2

	<u>Number of Reports</u>	<u>Funds Be Put To Better Use</u>
A. For which no management decision has been made by the commencement of the period	0	0
B. Which were issued during the reporting period	1	\$343,150
Subtotals (A+B)	1	\$343,150
C. For which a management decision was made during the reporting period	0	0
(i) Dollar value of recommendations that were agreed to by management	0	0
(ii) Dollar value of recommendations that were not agreed to by management	0	0
D. For which no management decision has been made by the end of the reporting period	1	\$343,150
Reports for which no management decision was made within six months of issuance	0	0

Every employee is the guardian of integrity.



**OIG Hotline
1 800 736-2983
oighotline@nlrb.gov
or
1099 14th Street, NW
Washington, DC 20570**