



THE SECRETARY OF TRANSPORTATION

WASHINGTON, D.C. 20590

June 30, 2009

William E. Reukauf
Associate Special Counsel
U.S. Office of Special Counsel
1730 M Street, NW, Suite 218
Washington, DC 20036

Re: OSC File No. DI-08-1734

Dear Mr. Reukauf:

This is in response to a letter of June 19, 2008, from former Special Counsel Scott Bloch concerning whistleblower allegations of management improprieties at the Federal Aviation Administration's (FAA) Southwest Region Flight Standards Division, Fort Worth, Texas. The complainant, Terry Lambert, a manager in the Southwest Region office, expressed concern that managers in the Region took certain actions to conceal information from Congress during its 2007-2008 probe into FAA's handling of Southwest Airlines' (SWA) knowing overflight of an FAA airworthiness directive.

Former Secretary of the U.S. Department of Transportation Mary Peters delegated responsibility for investigating Mr. Lambert's concerns to the Department's Inspector General, who has concluded his investigation and provided me the enclosed memorandum report containing his findings and recommendations. The Office of Inspector General (OIG) was unable to substantiate Mr. Lambert's concerns as presented. The OIG found, however, that given the Congressional inquiry, the actions of an FAA manager and her supervisor (now retired) in maintaining FAA investigative documents at her residence fostered an appearance of attempting to conceal information.

Based on this finding, the OIG recommended to FAA's Associate Administrator for Aviation Safety that FAA reinforce with this manager, and with the Flight Standards Service management corps, the expectation that original agency documents must not be maintained at employee residences. By the enclosed memorandum, the Associate Administrator responded to the OIG reporting the appropriate corrective actions taken.

I appreciate Mr. Lambert's diligence in raising his concerns.

Sincerely yours,

Ray LaHood

A large, stylized handwritten signature in black ink, which appears to be 'Ray LaHood', is written over the typed name and extends upwards and to the left.

Enclosures



Memorandum


U.S. Department of Transportation

Office of the Secretary
of Transportation

Office of Inspector General

Subject: ACTION: OIG Investigation #I08Z000328SINV,
Re: FAA Southwest Region Flight Standards Division

Date: June 18, 2009

From: 
Calvin L. Scovel III
Inspector General

Reply to
Attn of:

To: The Secretary

In accordance with the statutory requirements of the U.S. Office of Special Counsel (OSC), this presents our investigative findings and recommendations stemming from whistleblower concerns raised by Terry Lambert, Manager of the Safety Analysis and Evaluation Branch, FAA Southwest Region Flight Standards Division, Fort Worth, TX. Mr. Lambert made his disclosures to OSC, which, in turn, referred Mr. Lambert's allegations to then-Secretary Peters by letter dated June 19, 2008 (OSC File No. DI-08-1734). Former Secretary Peters delegated investigation of Mr. Lambert's disclosures to our office. Specifically, Mr. Lambert alleged:

1. In July 2007, when Mr. Lambert was serving as technical advisor to Jay LaFlair, FAA Security Special Agent, during FAA's investigation into Southwest Airlines' (SWA) overflight of an airworthiness directive (AD), Steven Douglas, Southwest Region Assistant Division Manager (Pay Band K), directed him to destroy his handwritten notes from the SWA investigation.¹

¹ Pursuant to 14 CFR Part 39, FAA issued Airworthiness Directive 2004-18-06, requiring airlines to inspect certain upper and lower skin panels on the fuselage of Boeing 737s for fatigue cracking. FAA's investigation of SWA determined that, after SWA discovered several aircraft were not in compliance with AD 2004-18-06, the Principal Maintenance Inspector (PMI), Douglas Gawadzinski, knowingly allowed SWA to continue operating numerous noncompliant aircraft in passenger revenue service.

These circumstances were examined during three Congressional hearings, at which we testified: on April 3, 2008, before the House Committee on Transportation and Infrastructure; on April 10, 2008, before the Senate Committee on Commerce, Science, and

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2. Mr. Lambert asserted that Mr. Douglas further instructed him to omit information regarding SWA Certificate Management Office (CMO) management and personnel issues from an executive summary of the investigation that he prepared for the Southwest Region's Division Management Team (DMT). Mr. Lambert suspected that Mr. Douglas gave him this instruction in order to conceal information from Congress.
3. In October 2007, after Congress requested information pertaining to FAA's investigation of SWA, Mr. Douglas instructed Mr. Lambert to transfer his investigative materials to Becky Ramsey, then-Southwest Region Labor Relations Specialist (Pay Band J).² Mr. Lambert gave Ms. Ramsey three or four binders containing investigation documents, and she took the binders home. Mr. Lambert suspected Ms. Ramsey took the documents home in order to conceal information in them from Congress.

If you accept the results of our investigation, we recommend you transmit this report to OSC, along with FAA's statement of corrective action in response to our findings and an accompanying recommendation.

Results in Brief

We were unable to substantiate Mr. Lambert's suspicion that Mr. Douglas directed him to destroy his handwritten notes from the SWA CMO investigation, and omit information regarding SWA CMO management and personnel issues from the DMT executive summary in order to conceal information from Congress.

First, the evidence does not show that Mr. Douglas directed Mr. Lambert to destroy his handwritten notes, and we found no FAA law, rule, regulation, or policy that prohibits the destruction of such notes. Second, Mr. Douglas' explanation for instructing Mr. Lambert to omit information from the executive summary appears reasonable. Even if Mr. Douglas' explanation appeared to lack credibility, the evidence indicates that neither he, nor any other Southwest Region official, was aware of a Congressional inquiry into SWA's overflight of an airworthiness directive at the time of Mr. Douglas' instruction. Further, even if Mr. Douglas knew of or anticipated a Congressional inquiry, the evidence does not indicate that he had a motive to conceal information; for example, the evidence does not indicate that Mr. Douglas sought to

Transportation, Subcommittee on Aviation Operations, Safety and Security; and on April 17, 2008, before the Senate Committee on Appropriations, Subcommittee on Transportation, Housing and Urban Development, and Related Agencies.

² Ms. Ramsey's current job title is Assistant Division Manager (Pay Band K).

protect Mr. Gawadzinski, subject of the SWA investigation. In fact, the evidence shows that much of the information Mr. Douglas instructed Mr. Lambert to omit, including information regarding possible wrongdoing by Mr. Gawadzinski, was already included, with Mr. Douglas' knowledge and approval, in Agent LaFlair's Report of Investigation (ROI) or later incorporated into his supplemental ROI.

Although we confirmed that Ms. Ramsey took investigation documents home, the evidence does not support Mr. Lambert's suspicion that she did so in order to conceal information contained therein from Congress. Ms. Ramsey told us she informed her then-supervisor, Pete Kerwin, Manager, Program Management Branch, about her decision, and he did not object. Mr. Kerwin (now retired) corroborated Ms. Ramsey's account of events, confirming that Ms. Ramsey told him that she planned to take the documents home, and he approved the decision. Notwithstanding, under the circumstances at the time, this action fostered an appearance that Ms. Ramsey was attempting to conceal investigative documents.

Based on this latter finding, we recommended to FAA's Associate Administrator for Aviation Safety that FAA reinforce with Ms. Ramsey, and with the Flight Standards Service management corps, the expectation that original agency documents must not be maintained at employee residences. The Associate Administrator responded to us via the attached memorandum reporting corrective actions taken. We consider FAA's actions responsive to our findings and recommendation.

Methodology

Our investigation, led by a senior Attorney-Investigator, included sworn interviews at FAA's Southwest Region Division office in Fort Worth with Mr. Lambert, Ms. Ramsey, and Assistant Division Manager Ron McGarry. Mr. Douglas also was interviewed, as were Agent LaFlair and Pete Kerwin, former Manager, Program Management Branch.³ In addition, we reviewed relevant FAA records/documents, including Agent LaFlair's SWA ROI and supplemental SWA ROI, executive summaries, correspondence, and emails.

³ Mr. Kerwin retired from federal service on January 3, 2009.

Background

In June 2007, the Southwest Region's DMT⁴ assigned Mr. Lambert, who had recently transferred to the Region Division office, to serve as a technical advisor to Agent LaFlair during FAA's investigation of SWA's overflight of an airworthiness directive. As such, Mr. Lambert's role was to explain Federal Aviation Regulations and the meaning of aviation terms and acronyms to Agent LaFlair. Mr. Lambert was also charged with keeping the DMT apprised of the progress of the investigation. To that end, Mr. Lambert prepared an executive summary, which he regularly updated and distributed to DMT members.

During the SWA investigation, Agent LaFlair interviewed witnesses and obtained sworn statements. Assistant Division Manager McGarry asked Mr. Lambert to take notes during Agent LaFlair's witness interviews on statements made about management and personnel issues at the SWA CMO. Mr. Lambert explained that, at that time, Southwest Region officials were aware of employee complaints of poor management, personality conflicts, and other personnel issues at the CMO. According to Mr. McGarry, because he had oversight responsibility for the CMO, he sought this additional information to assist him in devising solutions to the complaints. Mr. Lambert incorporated his notes on these issues into his DMT executive summary of Agent LaFlair's investigation into SWA's overflight of an airworthiness directive.

Mr. Douglas was on a temporary duty assignment in Hawaii for approximately four months in Spring 2007. He returned to the Southwest Region office in Summer 2007 as Mr. Lambert's first-line supervisor. Because the SWA investigation involved highly technical airworthiness issues, Mr. Douglas, the only airworthiness-certified member of the DMT, assumed oversight of Mr. Lambert and his executive summary.

On July 17, 2007, Mr. Lambert submitted a 10-page executive summary of the SWA investigation, with multiple attachments, to the DMT. One of the attachments was his synopsis of the notes he took during the investigation interviews. Mr. Lambert alleged that after Mr. Douglas reviewed the executive summary, Mr. Douglas directed him to remove the synopsis attachment, and any information in the summary regarding SWA CMO management and personnel issues. Mr. Lambert also alleged that Mr. Douglas directed him to destroy his handwritten notes from the investigation.

⁴ During the time in question, the DMT was comprised of Division Manager Tom Stuckey and two Assistant Division Managers, Ron McGarry and Steven Douglas. Mr. Lambert, Ms. Ramsey, Mr. Kerwin, and other Southwest Region managers also attended DMT meetings when their expertise was needed.

Pursuant to Mr. Douglas' instruction, Mr. Lambert edited his executive summary to contain only technical information regarding SWA's overflight of AD 2004-18-06. In particular, Mr. Lambert removed passages concerning possible wrongdoing by the subject of the investigation, SWA PMI Douglas Gawadzinski, and Mike Mills, then-Manager of the SWA CMO.⁵ As a result, the executive summary was reduced from ten pages to one. If the executive summary had been the sole report or the primary report on the SWA investigation, the removal of this information from the executive summary would be highly questionable. However, as discussed in greater detail below, we found that the information removed from the executive summary was incorporated into one of Agent LaFlair's Security ROIs, either the initial ROI or the supplemental ROI.

Mr. Lambert also told us that, in October 2007, after Congress requested a copy of Agent LaFlair's ROI, Mr. Douglas instructed him to transfer all of his SWA investigation materials to Ms. Ramsey, who was assigned to coordinate FAA's response to Congress.⁶ Mr. Lambert gave three or four binders of documents to Ms. Ramsey. Among other documents, the binders contained several draft versions of the executive summary, technical information regarding AD 2004-18-06, and a copy of an April 2007 technical evaluation of the SWA CMO.

On December 20, 2007, OSC referred whistleblower disclosures concerning SWA safety violations to then-Secretary Peters for investigation. Shortly thereafter, Secretary Peters requested a response to the disclosures from FAA. Because Mr. Lambert was previously involved in FAA's investigation of SWA's overflight of an airworthiness directive, Mr. Stuckey asked him to prepare FAA's response. Mr. Lambert realized that, in order to prepare his response, he needed access to the documents he gave to Ms. Ramsey. Because Ms. Ramsey was out of the office for two weeks teaching a course, Mr. Lambert searched her office for the binders but was unable to find them. Mr. Lambert informed Mr. Stuckey and Mr. Stuckey, in turn, telephoned Ms. Ramsey to inquire about the whereabouts of the binders. She told

⁵ Among other things, the original 10-page executive summary discusses the fact that, after SWA self-disclosed its overflight of AD 2004-18-06, Mr. Gawadzinski failed to ground the affected aircraft. In reference to Mr. Mills, the original 10-page executive summary states that Mr. Mills did not provide effective supervision of Mr. Gawadzinski and did not properly document all concerns within the SWA CMO or elevate them to the Regional Office.

⁶ OSC's referral of Mr. Lambert's disclosures alleged that Mr. Douglas instructed Mr. Lambert, with regard to his investigative material, to "get it out of here." More specifically, Mr. Lambert told us that Mr. Douglas instructed him to get the material "out of [his] office and give it to [Ms. Ramsey.]"

them she had taken them home. Ms. Ramsey returned the binders to Mr. Lambert on her first day back in the office.

Findings

1. We were unable to substantiate that Mr. Douglas directed Mr. Lambert to destroy his handwritten notes from the SWA investigation.

Mr. Douglas stated to us that he did not direct Mr. Lambert to destroy his handwritten notes from the SWA investigation. He told us that when Mr. Lambert asked him what he should do with his notes, he replied that as long as the SWA report was finished, he did not care what Mr. Lambert did with them; in fact, he said, Mr. Lambert could keep them or file them in his office. Mr. Douglas told us he emphasized to Mr. Lambert, however, that he did not want them.

Mr. Lambert confirmed to us that Mr. Douglas did not actually tell him to destroy his notes; rather, Mr. Douglas told him that he did not want the notes and to “get rid of that stuff.” Further, Mr. Lambert told us that even before Mr. Douglas instructed him to “get rid of” his notes, he had already shredded them after typing them up on his computer. He stated that he had done this because Ms. Ramsey and Mr. Douglas had informed him that, as a matter of practice, they shred their personal notes after submitting reports of investigation.

Thus, the evidence does not show that Mr. Douglas directed Mr. Lambert to destroy his handwritten notes from the SWA investigation. Moreover, we found no FAA law, rule, regulation or policy that prohibits the destruction of such notes where, like here, the information in the notes had already been incorporated into a report.

2. We were unable to substantiate Mr. Lambert’s suspicion that Mr. Douglas instructed him to omit information from the executive summary in order to conceal information from Congress.

a. Mr. Douglas’ explanation for instructing Mr. Lambert to omit information appears reasonable.

Mr. Douglas denied that he instructed Mr. Lambert to remove information regarding SWA CMO management and personnel issues from the executive summary in order to conceal information from Congress. He explained to us that, in his view, Mr. Lambert should not have noted what witnesses said because he was not a trained investigator and, in any event, the DMT could not rely upon his notes to support disciplinary action against FAA employees. Further, he explained that he instructed Mr. Lambert to remove references to SWA CMO management and personnel issues because

Mr. Lambert's role in the investigation was limited to providing technical information on SWA's overflight of the airworthiness directive to Agent LaFlair.

According to Mr. Lambert, when he informed Mr. Douglas that Mr. McGarry had instructed him to take notes on management and personnel issues, Mr. Douglas expressed the opinion that this assignment was inappropriate. Finally, Mr. Douglas stated that a Workplace Evaluation Assessment Team (WEAT) had already investigated, at the DMT's instruction, management and personnel issues at the SWA CMO. Thus, in his opinion, Mr. Lambert's report on these issues was unnecessary.⁷

Mr. Douglas' explanation for instructing Mr. Lambert to omit information from the executive summary appears reasonable. We found that Mr. Douglas and Mr. McGarry had a difference of professional opinion over the scope of Mr. Lambert's role in the SWA investigation, and we believe Mr. Douglas' opinion was reasonable. For example, it is likely that any disciplinary action resulting from the investigation would be based on the findings of the trained investigator, Agent LaFlair. In addition, we confirmed that the WEAT had already investigated management and personnel issues at the SWA CMO.

- b. Even if Mr. Douglas' explanation lacked credibility, the evidence indicates that neither he, nor any other Southwest Region official, was aware of a Congressional inquiry into SWA's overflight of an airworthiness directive at the time of Mr. Douglas' instruction.**

Mr. Lambert recollected that when Mr. Douglas instructed him to omit information from the executive summary in July 2007, the Southwest Region office had received a request for information from the House Committee on Transportation and Infrastructure regarding FAA's investigation of SWA's overflight of an airworthiness directive. The evidence indicates, however, that the Committee did not request this information from FAA's Southwest Region until it sent that office a letter dated October 5, 2007.

Although the October 5, 2007, letter references a prior Committee request for information that the Committee sent to FAA's Office of Government and Industry

⁷ We interviewed Agent LaFlair regarding his account of these events. According to Agent LaFlair, he was not privy to any conversations between Mr. Lambert and members of the DMT. Therefore, he did not possess firsthand knowledge of the instructions that Mr. Douglas or Mr. McGarry provided to Mr. Lambert regarding his role in the SWA investigation. Agent LaFlair further advised us that, when he and Mr. Lambert worked together on the SWA investigation, they never discussed the instructions Mr. Lambert received from members of the DMT.

Affairs at its headquarters, the evidence indicates that no Southwest Region official, including Mr. Douglas, was aware of the prior request. For example, Ms. Ramsey explained that upon receipt of the October 5 letter, she questioned Region officials in an attempt to track down the prior request; however, no one she spoke with knew of it. Further, Patty Keck, Management and Program Analyst, who handles Congressional inquiries and correspondence for the Southwest Region office, corroborated Ms. Ramsey's assertion that the October 5, 2007, letter was the first Congressional inquiry received by the Region on the SWA overflight issue.

c. Even if Mr. Douglas knew of or anticipated a Congressional inquiry, the evidence does not indicate that he had a motive to conceal information.

Mr. Lambert suspected that Mr. Douglas instructed him to omit information from the executive summary in order to protect the subject of the FAA Security investigation, Doug Gawadzinski, the PMI for SWA. In support of his theory, Mr. Lambert noted that after Mr. McGarry and Ms. Ramsey reviewed Agent LaFlair's initial ROI, they recommended Mr. Gawadzinski's removal. However, Mr. Douglas, he pointed out, argued in favor of Mr. Gawadzinski receiving a lesser penalty of a downgrade and reassignment.⁸

Although Mr. Douglas did, initially, argue in favor of lesser disciplinary action for Mr. Gawadzinski, the evidence indicates he had a reasonable basis for doing so at that time. Mr. Douglas explained that he did not believe that Agent LaFlair's ROI set forth sufficient evidence to support Mr. Gawadzinski's removal, especially since it would have been his first disciplinary action. More importantly, Mr. Douglas subsequently educated Mr. Lambert on what evidence was needed to support Mr. Gawadzinski's removal, so that he could assist Agent LaFlair in obtaining this evidence. In fact, based on the additional information from Agent LaFlair's follow-up investigation, Mr. Douglas ultimately concurred with the decision to remove Mr. Gawadzinski.

Moreover, we reviewed the information Mr. Douglas instructed Mr. Lambert to remove from the executive summary. Among other items, Mr. Lambert removed passages concerning possible wrongdoing by Mr. Gawadzinski and Mike Mills, then-Manager of the SWA CMO. However, this information was already incorporated, with Mr. Douglas' knowledge and approval, into Agent LaFlair's ROI or later included in Agent LaFlair's supplemental ROI.

⁸ The topic of disciplining Mr. Gawadzinski was discussed at several DMT meetings. Although Mr. McGarry was ultimately the deciding official, Mr. Douglas weighed in on the decision as a member of the DMT.

In sum, the evidence does not reflect that Mr. Douglas was trying to protect Mr. Gawadzinski.

3. Although Ms. Ramsey took investigation documents home, we did not substantiate Mr. Lambert's suspicion that she did so in order to conceal information from Congress. Nonetheless, we find this action fostered an appearance that she attempted to conceal information.

Ms. Ramsey confirmed that Mr. Lambert gave her several three-ring binders containing documents related to the SWA investigation that were subject to the October 5, 2007, Congressional inquiry. She also corroborated Mr. Lambert's assertion that she took the binders home. According to Ms. Ramsey, she initially stored the binders on a shelf in her office for three months, but because she eventually ran out of space in her office and because there was no other secure storage space available on-site, she stored them at home.

Ms. Ramsey elaborated that, during the time in question, she was working on several labor relations cases, and the associated case files and supporting documents occupied much of her office space. For example, she stated that her file cabinet was filled with files associated with the Southwest Region's defense of a class action lawsuit. She also explained that she was involved in the Region's efforts to pursue disciplinary action against the individuals implicated in the SWA investigation, and those case files were also stored in her office. She further explained that, in keeping with FAA policy, she stored copies of case files closed during the previous four years.

Ms. Ramsey advised us that, because of the sensitive nature of the files described above, she kept them secure in her locked office. On the other hand, she explained that she did not believe the information contained in the binders Mr. Lambert gave her was sensitive. Instead, she regarded it as "merely technical." Therefore, when she ran out of storage space in her office and decided to take some documents home, she selected the binders for relocation. Ms. Ramsey told us she informed her then-supervisor, Mr. Kerwin, about her decision, and he did not object. Mr. Kerwin corroborated Ms. Ramsey's account of events. Mr. Kerwin confirmed that Ms. Ramsey told him that she planned to take the binders home, and he approved the decision. Mr. Kerwin also confirmed that alternative secure storage options were not available at the facility at the time.

Mr. Lambert suspected that, by removing the documents from FAA premises, Ms. Ramsey intended to prevent them from being subject to Congressional subpoena. We do not believe this theory is reasonable. We cannot foresee a Congressional subpoena that would limit an information request to only those documents maintained

on agency premises, nor did we find evidence indicating that Ms. Ramsey thought a subpoena would be so limited.

In any event, we did not uncover evidence that Ms. Ramsey had a motive to conceal the information contained in the binders. First, Ms. Ramsey was not a subject of the SWA investigation, nor was she implicated in the investigation's findings. Second, based on the information we obtained, Ms. Ramsey did not regularly interact with any of the subjects of the investigation, nor does it appear that she had any other reason to protect them. To the contrary, early on in the DMT's deliberations over appropriate disciplinary action for Mr. Gawadzinski, she recommended that FAA pursue Mr. Gawadzinski's removal.

Moreover, after Mr. Stuckey inquired into the whereabouts of the binders, Ms. Ramsey's response and subsequent actions were consistent with her assertion that she did not bring the binders home with the intent of withholding information from Congress. When Mr. Stuckey telephoned Ms. Ramsey, she was forthright about the location of the binders, telling him that she had them at home. Furthermore, Ms. Ramsey returned the binders as soon as she had the opportunity to do so, i.e., on her first day back at the office.

Although we did not substantiate Mr. Lambert's concern that Ms. Ramsey's intended to withhold information from Congress, her action, as approved by her supervisor, Mr. Kerwin, fostered an appearance that she attempted to conceal information related to a significant investigation—the results of which led to considerable scrutiny of FAA by Congress, our office and the Department, and other sources.

Recommendation

Based on the foregoing, we recommended to Peggy Gilligan, FAA's Associate Administrator for Aviation Safety, by memorandum dated June 15, 2009, that FAA reinforce with Ms. Ramsey, and with the Flight Standards Service management corps, the expectation that original agency documents must not be maintained at employee residences. Ms. Gilligan responded to us via the attached memorandum, dated June 17, 2009, reporting corrective actions taken. We consider FAA's actions responsive to our findings and recommendation.

If I can answer any questions or be of further assistance, please contact me at (202) 366-1959, or David Dobbs, Deputy Inspector General, at (202) 366-6767.

Attachment

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Federal Aviation Administration

Memorandum

Date: June 17, 2009

To: Rick Beitel, Assistant Inspector General for Special Investigations and Analysis, JI-3

From: Margaret Gilligan, Associate Administrator for Aviation Safety, AVS-1

Prepared by: Cecilia Capestany, Chief of Staff, AVS-3

Subject: OIG Investigation #I08Z000328SINV, RE: Southwest Region Flight Standards Division

In your memorandum dated June 15, 2009, on findings on above investigation, you made a recommendation that we "reinforce with Ms. Ramsey, and with the Flight Standards Service Management corps, the expectation that original agency documents must not be maintained at employee residences." Below follow the actions we have taken to date to comply with your recommendation.

Earlier this week, Ms. Ramsey was notified by her management chain that she should not have kept agency records at her home and that she should not do so in the future.

Further, on June 17, an electronic message from the Deputy Director of Flight Standards entitled "Safeguarding Original Agency Records" went to the Flight Standards Service workforce to reinforce the expectation that agency records should not be maintained at employees' homes. The actual text is reproduced here:

"Per a recent Office of Inspector General investigation, this communication is to remind all Flight Standards Management officials that we are prohibited from taking home or maintaining at our residence 'Original Agency Records'.

This includes personnel records. Please ensure this message is provided to all Supervisory/Management personnel. Thanks for your attention to this matter."