U.S. DEPARTMENT OF ENERGY

Office of Inspector General

DOE-OIG-26-38

June 1, 2026

Additional Action Would Assist the Advanced Research Projects Agency – Energy to Fulfill the U.S. Manufacturing Requirement

AUDIT REPORT

Department of Energy
Washington, DC 20585

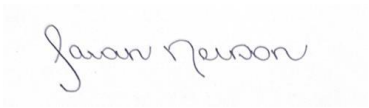
June 1, 2026

MEMORANDUM FOR THE DIRECTOR, ADVANCED RESEARCH PROJECTS AGENCY – ENERGY

SUBJECT: Audit Report: *Additional Action Would Assist the Advanced Research Projects Agency – Energy to Fulfill the U.S. Manufacturing Requirement*

The attached report discusses our audit of the Advanced Research Projects Agency – Energy implementation of the United States manufacturing requirement. This report contains one recommendation that, if fully implemented, should help ensure that awardees are complying with the U.S. manufacturing requirement. Management concurred with our recommendation.

We conducted this audit from July 2025 through February 2026 in accordance with generally accepted government auditing standards. We appreciated the cooperation and assistance received during this audit.



Sarah Nelson
Assistant Inspector General
for Management
Performing the Duties of the Inspector General
Office of Inspector General

Attachment

cc: Deputy Secretary
Chief of Staff

DOE OIG HIGHLIGHTS

Additional Action Would Assist the Advanced Research Projects Agency – Energy to Fulfill the U.S. Manufacturing Requirement

Why We Performed This Audit

Authorized in 2007, the Advanced Research Projects Agency – Energy (ARPA-E) is a semi-autonomous agency within the Department of Energy, created to enhance the economic and energy security of the United States. Since its inception, ARPA-E has provided $4.21 billion in research and development funding to more than 1,700 projects designed to disrupt and create major shifts in the energy industry to the benefit of the U.S. In accomplishing its mission, ARPA-E funds projects in line with the U.S. manufacturing (USM) requirement, which stipulates that awardees substantially manufacture any products or processes created using Federal funds, also known as subject inventions, within the U.S.

Given the importance of the USM requirement to our national interests, we initiated this audit to determine whether ARPA-E was effectively implementing the domestic manufacturing requirement.

What We Found

We found that ARPA-E could improve its oversight processes to more effectively implement the domestic manufacturing requirement. Specifically, we found that ARPA-E did not always perform site visits, as required. Further, we found that ARPA-E did not validate self-reported utilization data.

These issues occurred, in part, because ARPA-E did not always follow its policies and guidance. Further, APRA-E's policies and guidance were limited, as it did not establish criteria for deviation from site visit expectations or prescribe documentation requirements. In addition, ARPA-E lacked policies and procedures for officials to validate utilization data related to disclosed subject inventions.

Without consistently performing and documenting site visits or validating utilization data, ARPA-E is unable to consistently apply oversight procedures related to the USM requirement.

What We Recommend

To address the issues identified in this report, we made one recommendation that, if fully implemented, should help ensure that ARPA-E awardees are complying with the USM requirement.

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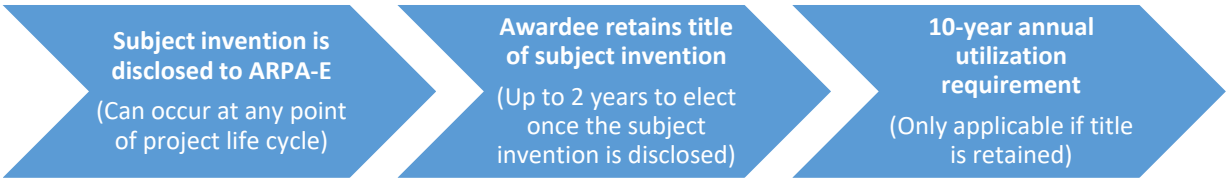
Background and Objective

Authorized in 2007,[1] the Advanced Research Projects Agency – Energy (ARPA-E) is a semi-autonomous agency within the Department of Energy, created to enhance the economic and energy security of the United States. Since its inception, ARPA-E has provided $4.21 billion in research and development funding to more than 1,700 projects. ARPA-E requires award recipients to substantially manufacture any products resulting from a subject invention[2] within the U.S., commonly referred to as the U.S. manufacturing (USM) requirement. ARPA-E works with the Department's Office of the Assistant General Counsel for Technology Transfer and Intellectual Property to investigate violations of and enforce the USM requirement.

The USM requirement is incorporated into ARPA-E's award terms and conditions through the "U.S. Competitiveness" clause of the Intellectual Property provisions. ARPA-E's award terms and conditions also require awardees to disclose each subject invention to ARPA-E. Following the disclosure, awardees have 2 years to notify the Department whether it elects to retain title[3] to its subject invention. If an awardee retains title, it is required by 2 Code of Federal Regulations § 910.364, "Reporting on utilization of subject inventions," to submit annual reports on the utilization efforts of the subject invention for at least 10 years from the date the subject invention was first disclosed to the Department.



All ARPA-E awardees are subject to 2 Code of Federal Regulations § 200.339, "Remedies for noncompliance," which allows the Department to temporarily withhold payments, disallow certain costs, suspend or terminate the award, initiate suspension or debarment proceedings, or withhold future Federal funds. These remedies assist ARPA-E to ensure USM, subject invention disclosure, and utilization reporting requirements are met. In addition, ARPA-E awardees also face the potential forfeiture of rights to disclosed subject inventions for noncompliance with award terms and conditions. Given the importance of the USM requirement to our national interests, we initiated this audit to determine whether ARPA-E was effectively implementing the domestic manufacturing requirement.

[1] ARPA-E was initially authorized in 2007 as a part of the *America COMPETES Act*. However, operations did not begin until 2009 when ARPA-E received $15 million from the *Omnibus Appropriations Act of 2009*. ARPA-E later received $400 million from the *American Recovery and Reinvestment Act of 2009*.

[2] In simple terms for this report, a "subject invention" is any invention that an awardee creates while working on an ARPA-E-funded project. This includes new software, materials, or processes developed under an award. An invention does not have to be made with Government money, but it must be conceived or first put into practice during the award.

[3] If an awardee retains title, they hold the legal ownership of the subject invention. This election gives the awardee the right to file for patents and commercialize the technology.

Results of Review

ARPA-E COULD IMPROVE ITS OVERSIGHT PRACTICES RELATED TO THE U.S. MANUFACTURING REQUIREMENT

We found that ARPA-E could improve its process to more effectively implement the domestic manufacturing requirement. Specifically, we found that ARPA-E did not always conduct required activities to oversee its awards. For example, our test work revealed that ARPA-E did not always perform site visits, as required. Further, we found that ARPA-E did not validate utilization data.

ARPA-E Did Not Always Perform Site Visits

We found that ARPA-E did not always perform site visits, as required. Specifically, the "Federal Stewardship" clause included in ARPA-E's award terms and conditions states that ARPA-E officials will conduct site visits as part of its oversight activities. In addition to its award terms and conditions, ARPA-E's internal policies and guidance reiterate the site visit requirement. For example, ARPA-E's 2014 *Project Monitoring and Oversight Policy* states that program directors are substantially involved in the administration of projects through active monitoring and oversight. This includes regular site visits to project work sites, typically no less than two times a year, to monitor progress, verify performance, and inspect equipment purchased. Additionally, ARPA-E's 2020 *Active Project Management Program Director Best Practices* guidance, which is used to train program directors, states that site visits allow for in-depth and real-time project evaluation that can be critical for project oversight and should occur no less than twice per year. Site visits also provide the opportunity for ARPA-E to verify the location of manufacturing efforts, if occurring, to remind awardees of reporting requirements and to help identify or deter potential unreported subject inventions, which, according to ARPA-E officials, are a major risk because it enables circumvention of the USM requirement. For example, if a subject invention is not reported, the Department does not have the means to enforce the USM requirement. Despite the requirement to conduct site visits, our test work revealed that ARPA-E officials had not conducted site visits for 9 of 20 awards (45 percent) we reviewed. For seven of these projects, ARPA-E officials confirmed that site visits were not performed, citing reasons such as travel restrictions due to COVID-19 and the partial Government shutdown in 2019. For the other two projects, ARPA-E officials told us that site visits were performed, but they were unable to provide documentation of the results.

These issues occurred, in part, because ARPA-E did not always follow its own policies and guidance. Further, its policies and guidance were limited as they did not formalize criteria for deviating from site visit expectations or requirements for documenting site visits. Specifically, neither ARPA-E's *Project Monitoring and Oversight Policy* nor its *Active Project Management Program Director Best Practices* guidance document formalized acceptable deviations from the expectation that site visits be performed twice a year. ARPA-E officials stated that once COVID-19 travel restrictions eased, site visits were not performed for some projects because the awards were for software design or purely computational in nature and were considered low priority for a site visit. However, neither the policy nor guidance stipulate these as acceptable reasons to forgo site visits. In addition, while ARPA-E officials told us that the results of site visits were captured in quarterly memoranda, ARPA-E's policies and guidance did not specify where and

how to document the results of site visits. Formally documenting all criteria for site visits is essential because the individuals that work with and oversee the awardees on a day-to-day basis are typically only with ARPA-E for 3- to 5-year terms. Without more prescriptive policies or guidance for site visits, it is difficult for ARPA-E to ensure consistent, effective monitoring of its projects, including overseeing compliance with USM and subject invention disclosure requirements. To its credit, in response to our audit efforts, ARPA-E began updating its *Project Monitoring and Oversight Policy* addressing various situations where site visits could be prioritized as well as creating documentation requirements.

ARPA-E Did Not Validate Utilization Data

We found that ARPA-E did not validate the accuracy of utilization data self-reported by its awardees. ARPA-E, via its "Federal Stewardship" clause within its award terms and conditions for cooperative agreements, is legally required to oversee project activities and compliance with terms and conditions of the award, including reviewing technical requirements and performance, both during and after project completion. However, our review found that ARPA-E was not validating utilization data, an oversight step that would help ensure compliance with the award terms and conditions after project completion, such as the USM requirement. For example, our review of utilization data for 20 ARPA-E awards reporting a total of 62 subject inventions found:

- Two awards did not report any utilization data for 3 subject inventions; and
- Two awards were missing some annual utilization data for 3 subject inventions.

Officials confirmed that ARPA-E did not validate utilization data. Instead, ARPA-E relied on the awardees' obligation to self-report utilization data for each of its subject inventions timely and consistently. While Assistant General Counsel for Technology Transfer and Intellectual Property officials stated they perform investigations when utilization data includes foreign manufacturing and no USM modification had been agreed to, these efforts occurred after awardees self-reported such instances of noncompliance with the USM requirement. As such, awardees may be able to circumvent the USM requirement and the intent of the utilization data requirement by not reporting factual locations of manufacturing. This is concerning as most manufacturing efforts occur following award close-out, sometimes several years after the award period of performance when ARPA-E's oversight activities, such as site visits, may no longer be utilized as they were during the period of performance. To assist in post-award oversight of the USM requirement, ARPA-E officials stated that they also monitored manufacturing locations by tracking follow-on funding and monitoring news alerts. However, these oversight activities were not formally documented in ARPA-E's *Project Monitoring and Oversight Policy*.

This occurred, in part, because ARPA-E lacked policies and procedures requiring officials to validate utilization data related to disclosed subject inventions. According to officials, ARPA-E was not required to validate utilization data because iEdison, a system operated by the National Institute of Standards and Technology in which awardees across the Federal Government report utilization and disclose subject inventions, did not require such oversight. In addition, ARPA-E officials asserted that not validating utilization data is a Government-wide practice and indicated that site visits are only utilized during an award's period of performance. Although not specifically required, compliance with award terms related to Federal stewardship cannot be

achieved without policies and procedures to better ensure a consistent approach to validating utilization data, which is essential to ensuring compliance with the USM requirement. Had ARPA-E validated utilization data, it would have identified the discrepancies we identified and could have initiated timely corrective actions with the awardees to ensure all required utilization reports were submitted.

CONCLUSION

Without following existing policies or procedures for consistently performing and documenting site visits or having policies and procedures for validating utilization data, ARPA-E is unable to consistently apply oversight procedures related to the USM requirement. This is significant as ARPA-E relies on program directors and technical support staff serving 3- to 5-year terms to perform oversight duties. Considering efforts to comply with the USM requirement may not occur for years after the formal award closeout, turnover by ARPA-E oversight functions is to be expected. Having robust and detailed policies and procedures ensures consistent oversight of awards. While our audit work did not identify any unreported subject inventions, without consistent and routine site visits, ARPA-E is not always utilizing a valuable tool for determining whether awardees report all subject inventions, as required. This is significant as unreported subject inventions are a means by which awardees could circumvent the USM requirement. Failure to report subject inventions, as required, could result in the Department taking title to the invention or pursuing regulatory remedies for noncompliance with award terms and conditions.

Recommendation

To address the issues identified and ensure ARPA-E more effectively administers the USM requirement, we recommend that the Director, ARPA-E:

1. Follow and enhance existing policies and procedures for monitoring activities related to the USM requirement, including:

    a. Conducting and documenting site visits; and

    b. Validating iEdison utilization data.

Management Comments and OIG Response

Management provided comments, concurred with our recommendation, and identified responsive corrective actions to address the reported issues. We reviewed management comments and updated the report, as appropriate. For Recommendation 1.a., management stated it had already taken steps to follow and enhance existing policies and procedures for monitoring activities related to the USM requirement, including conducting and documenting site visits. Specifically, ARPA-E has updated its *Project Monitoring and Oversight Policy* to specify: (1) situations where site visits should be prioritized; (2) situations where virtual meetings may be preferable to site visits; (3) site visit documentation requirements; and (4) additional guidance on meetings and PD Memos. For Recommendation 1.b., management agreed that there are opportunities to document and enhance existing policies and procedures for monitoring activities, including additional validation of iEdison utilization data. Management indicated that

ARPA-E will create a document that clarifies how it will interpret validation and describe current policies followed and procedures used to validate utilization reporting. For example, the ARPA-E IMPACTS team is reviewing all product data in the utilization reports to confirm the existence and uniqueness of those products. In addition, ARPA-E is working with the Department's Patent Counsel to identify categories of utilization data that are likely to yield the most actionable results and are also most easily verified. Management also indicated it would continue to investigate ways in which monitoring and validation efforts could be improved.

Management's comments are included in Appendix 3.

Objective, Scope, and Methodology

Objective

We conducted this audit to determine whether the Advanced Research Projects Agency – Energy (ARPA-E) was effectively implementing the domestic manufacturing requirement.

Scope

We performed the audit from July 2025 through February 2026. The scope of our audit covered various aspects of the oversight surrounding the United States manufacturing (USM) requirement within ARPA-E's awards. We conducted our work in Washington, DC; Pittsburgh, Pennsylvania; Golden, Colorado; and Lemont, Illinois. The audit was conducted under Office of Inspector General project number A25PT008.

Methodology

To accomplish our audit objective, we:

- Reviewed applicable laws, regulations, policies and procedures, and Department of Energy guidance related to the USM requirement.
- Interviewed personnel from ARPA-E, as well as the Department's Office of the Assistant General Counsel for Technology Transfer and Intellectual Property, to determine their roles in management and enforcement of the USM requirement.
- Obtained and reviewed a list of ARPA-E awards that requested and received approval for USM waivers/modifications.
- Selected a judgmental sample of 20 ARPA-E awards for detailed test work to ensure timely review and/or documentation of site visits, quarterly reports, final technical reports, and iEdison utilization data. Sample selection was based on factors including award type, project status, and number of disclosed subject inventions. Because a judgmental sample was used, results are limited to the awards selected and cannot be projected to the entire population.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed the internal control components of control environments, control activities, and monitoring activities, as well as the underlying principles of implement control activities and

performing monitoring activities. However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit. The audit team performed limited testing on computer-processed data, including: (1) electronic testing for obvious errors in accuracy and completeness; (2) reviewing existing information about the data and the system that produced them; and (3) interviewing agency officials knowledgeable about the data. No issues were identified during our test work; therefore, we determined that the data was sufficiently reliable for the purposes of this report, and we did not perform a full reliability assessment as a part of our review.

We held an exit conference with management officials on May 13, 2026.

Related Reports

Office of Inspector General

- Audit Report: *Followup on the Small Business Innovation Research and Small Business Technology Transfer Programs* (OAI-M-17-06, April 2017). We found that the Department of Energy's Office of Science and the Advanced Research Projects Agency – Energy (ARPA-E) did not always efficiently and effectively manage its Small Business Innovation Research and Small Business Technology Transfer programs in the areas of financial management, adherence to award terms and conditions, and with respect to the Office of Science award closeout. Through a review of eight Office of Science grants and one ARPA-E cooperative agreement, we found that three recipients had not properly accounted for, or maintained adequate supporting documentation for, a portion of their project expenses. Additionally, the Department had not ensured that three recipients met all terms and conditions of their awards. Specifically, we identified instances where recipients had not obtained required audits, had not ensured adequate participation by a nonprofit research institution, or had not adequately documented involvement of the principal investigator, as required by their awards. The issues that we identified were primarily due to recipients having a lack of awareness of regulations and specific award terms and conditions and, at times, Department officials providing limited oversight.

- Audit Report: *The Advanced Research Projects Agency – Energy* (OAS-RA-11-11, August 2011). We found that ARPA-E generally had systems in place to make research awards and to deploy *American Recovery and Reinvestment Act of 2009* resources. However, ARPA-E had not established a systematic approach to ensure that it was meeting the technology transfer and outreach requirement of the *America COMPETES Act*. Specifically, ARPA-E had not required funding recipients to expend a percentage of their awards on technology transfer. Also, we found that ARPA-E had not drafted or, in some cases, approved draft policies and procedures in a number of key areas, including those in the areas of monitoring and oversight of awardees, termination of non-performing awards technology transfer and outreach, and invoice review. Additionally, through transaction testing we performed at three recipient sites, we identified and questioned approximately $280,387 in unsupported, unreasonable, or unallocable costs, or costs considered to be specifically unallowable, incurred by two recipients. We found that ARPA-E focused its attention on meeting the *American Recovery and Reinvestment Act of 2009* requirement of expeditiously awarding funds to projects, and consequently did not have sufficient time and resources to devote to establishing all its operational controls in the area of policies and procedures.

Government Accountability Office

- Audit Report: *DEPARTMENT OF ENERGY: Actions Needed to Assess U.S. Manufacturing Policy and Protect Technology from Foreign Acquisition* (GAO-24-106504, May 2024). The Government Accountability Office found that in 2021, the Department changed its policy on the licensing of technologies developed with Departmental research funding to expand the scope of the United States manufacturing requirement for Department-funded inventions. However, the Department did not have a strategy or approach to assess the effects of this policy. In particular, the Department did not have metrics to measure whether the policy was likely to increase U.S. manufacturing of Department-funded inventions or the willingness of companies to develop inventions. In addition, the Department did not oversee universities it funded to the same degree as contractors. Without such a review, the Department could not know whether university licensees complied with the terms of their licenses, including the U.S. manufacturing requirement. Further, the Government Accountability Office found that the Department Laboratories and universities it reviewed took steps to manage risks posed by foreign companies acquiring Department-funded technology via licensing; however, their approaches were inconsistent and, in some cases, not thorough. This inconsistency resulted, in part, from the Department's lack of guidance or requirements about foreign acquisition risks. Without consistent risk management practices, the Department could not ensure that inventions it funded were sufficiently protected from the risk of foreign control.

Management Comments

Department of Energy
Washington, DC 20585

MEMORANDUM FOR SARAH NELSON
ASSISTANT INSPECTOR GENERAL FOR MANAGEMENT

FROM: CONNER PROCHASKA
DIRECTOR, ADVANCED RESEARCH PROJECTS AGENCY – ENERGY

SUBJECT: Additional Action Would Assist the Advanced Research Projects Agency – Energy to Fulfill U.S. Manufacturing Requirements (A25PT008)

Thank you for the opportunity to review and comment on the subject draft report. The Advanced Research Projects Agency – Energy (ARPA-E) appreciates the auditors' audit work and provides the following comments below:

ARPA-E, in close coordination with DOE Patent Counsel, has consistently placed significant emphasis on the importance of U.S. manufacturing (USM) of subject inventions. This emphasis has resulted in innovative funding opportunities that encourage awardees to timely report their inventions (e.g., the ARPA-E SCALEUP Program), new data analytics tools to help identify potentially unreported inventions, and a collaborative approach to negotiate reasonable modifications to the USM requirement with awardees that enables commercially-competitive manufacturing while preserving significant benefit to the U.S. economy in recognition of taxpayer investment in the awardee's early stage energy technology. In the same collaborative spirit, ARPA-E offers the below comments to help clarify some points in the Draft Audit Report.

The first sentence of the third paragraph on page 1 implies that 2 C.F.R. 200.339 is specific to USM, subject invention disclosure, and utilization reporting requirements. To clarify, 2 C.F.R. 200.339 applies to noncompliance generally, which could mean noncompliance with any award terms or the U.S. Constitution, Federal statues, or regulations. Furthermore, the remedies for noncompliance identified in this regulation are intended to address compliance issues that occur during the award period of performance. The vast majority of subject invention utilization reports are submitted after an award term has ended – utilization reports are required for a period of years after the award is completed and not due until after the invention is reported in iEdison and title elected. This effectively eliminates all the available remedies in 200.339 except one -- "Initiate suspension or debarment proceedings…."

The first sentence of the third paragraph on page 2 is a change from the prior draft ARPA-E received and is misleading, as it implies that ARPA-E took actions that were contrary to its policies. Rather, ARPA-E's policies were followed but were not formally documented. ARPA-E views the language in the prior draft as more accurate ("These issues occurred, in part, because

Enclosure

Management Response
OIG Draft Report:
Additional Action Would Assist the Advanced Research Projects Agency – Energy to Fulfill U.S. Manufacturing Requirements (A25PT008)

ARPA-E's policies and guidance did not formalize criteria for when site visits could be waived or requirements for documenting site visits.").

The last sentence of the last paragraph on pages 3-4 is confusing and inconsistent with prior language in the draft report. The use of "validate" in this sentence and as defined at the beginning of this section is at odds with the "discrepancies" noted on page 3. The first sentence of this section of the report states that "ARPA-E did not validate the accuracy of utilization data self-reported by its awardees". However, the noted "discrepancies" found by OIG were not discrepancies in the *accuracy* of utilization reports, as is implied in this sentence, but discrepancies in *submissions* of utilization reports. ARPA-E did identify such discrepancies in utilization reporting (e.g. missing reports), which are tracked through IMPACTS data that was provided to OIG, and ARPA-E did take reasonable steps to remedy these discrepancies (e.g., email reminders to awardees to submit utilization reports). As previously stated, suspension and debarment (the only remedy available under 2 C.F.R. 200.339 for the vast majority of entities required to submit a utilization report), is not a proportionate remedy for a good faith failure to submit a utilization report alone without additional instances of noncompliance or wrongdoing by the awardee.

The attachment to this memorandum details actions planned to be taken by ARPA-E to address the recommendations in the report.

If you have any questions regarding this response, please contact Geoff Goode, ARPA-E Chief Counsel (202-809-2866, Geoffrey.goode@hq.doe.gov).

Enclosure

Enclosure

Management Response
OIG Draft Report:
Additional Action Would Assist the Advanced Research Projects Agency – Energy to Fulfill U.S. Manufacturing Requirements (A25PT008)

Recommendation 1: To address the issues identified and ensure ARPA-E more effectively administers the USM requirement, we recommend that the Director, ARPA-E:

1. Follow and enhance existing policies and procedures for monitoring activities related to the USM requirement, including:
    a. Conducting and documenting site visits; and
    b. Validating iEdison utilization data.

DOE Response:

ARPA-E concurs with and has already taken steps to implement recommendation 1.a. to follow and enhance existing policies and procedures for monitoring activities related to the USM requirement, including conducting and documenting site visits. To address this recommendation, ARPA-E has updated its *Project Monitoring and Oversight Policy* to specify (1) situations where site visits should be prioritized, (2) situations where virtual meetings may be preferable to site visits, (3) site visit documentation requirements, and (4) additional guidance on meetings and PD Memos. The updated policy is currently under review and will be finalized soon.

With respect to recommendation 1.b. ARPA-E concurs with the recommendation and agrees that there are opportunities to document and enhance existing policies and procedures for monitoring activities related to the USM requirement, including additional validation of iEdison utilization data. However, DOE notes that the OIG only identified 4 awards out of 20 awards reviewed with ***missing*** utilization information which were already flagged by iEdison. OIG did not explain what "validation" steps it envisions or the resources required. As a result, to address this recommendation, ARPA-E will create a document that clarifies how ARPA-E interprets "validation" in the context of utilization reporting and describes current policies followed and procedures used by ARPA-E and DOE Patent Counsel to validate utilization reporting data. ARPA-E will also continue to investigate ways in which monitoring and validation efforts can be improved. For example, the ARPA-E IMPACTS team is reviewing all product data in the utilization reports to confirm the existence and uniqueness of those products. In addition, ARPA-E is working with DOE Patent Counsel to identify categories of utilization data that are likely to yield the most actionable results and are also most easily verified. These efforts will be included in the new process document addressing the validation of subject invention utilization data and USM compliance.

Estimated Completion Date: ARPA-E anticipates completing the actions addressing recommendation 1.a. by July 31, 2026, and the actions addressing recommendation 1.b. by October 31, 2026.

FEEDBACK

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