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Office of Inspector General
Office of Audits and Inspections

SPECIAL REPORT

Enforcement Activities Conducted by the
Federal Energy Regulatory Commission

DOE/IG-0947

September 2015



Department of Energy
Washington, DC 20585

September 29, 2015

MEMORANDUM FOR THE CHAIRMAN, FEDERAL ENERGY REGULATORY
COMMISSION

A handwritten signature in cursive script, appearing to read "Greg Friedman".

FROM: Gregory H. Friedman
Inspector General

SUBJECT: INFORMATION: Special Report: "Enforcement Activities Conducted
by the Federal Energy Regulatory Commission"

BACKGROUND

The Federal Energy Regulatory Commission (FERC) is an independent agency that regulates the Nation's natural gas industry, hydroelectric projects, oil pipelines, and wholesale rates for electricity. Within FERC, the Office of Enforcement (OE) is tasked with protecting customers by conducting oversight of energy markets, identifying and remedying market problems in a timely manner, ensuring compliance with rules and regulations, and detecting and combating market manipulation. FERC's enforcement authority is derived from the *Federal Power Act of 1935*, the *Natural Gas Act of 1938*, and the *Natural Gas Policy Act of 1978*. Through the *Energy Policy Act of 2005* (EPAct 2005), Congress granted FERC enhanced authority to assess civil penalties for violations of these Acts and established the maximum civil penalty FERC may assess as \$1,000,000 per violation for each day that it continues.

OE initiates and executes investigations of possible violations of the statutes administered by FERC and the rules, orders, and regulations issued thereunder. Given the importance of FERC's mission and the significance of its expanded enforcement authority, we initiated this special review of OE's enforcement activities and related policies and procedures. OE's enforcement activities include investigations of FERC-regulated entities and handling of hotline calls and self-reports of possible violations.

RESULTS OF AUDIT

To accomplish our objective, we reviewed 7 closed investigations, 20 closed hotline cases, and 10 closed cases regarding potential violations, which had been self-reported by regulated entities.^{1,2} We did not review open cases so as to avoid any Office of Inspector General (OIG)

¹ OE's Enforcement Hotline receives complaints, informally resolves disputes, and provides informed staff opinions and general information to callers concerning any matter subject to the FERC's jurisdiction.

² According to FERC, self-reporting of possible violations by regulated entities is encouraged, and in many cases, self-reported violations have resulted in closure of the matter without sanctions.

interference with ongoing enforcement activities. We assessed OE's activities based on enforcement policies, procedures, pertinent public and nonpublic documentation, and interviews with investigative staff. Based on this examination, nothing came to our attention to indicate that OE had not performed enforcement activities in accordance with its own policies and procedures.

During the course of our inquiry, we received expressions of interest from four members of the U.S. Senate who requested that we review certain aspects of FERC's enforcement activities. Our review procedures incorporated those concerns expressed by the Senators related to issues involving the existence, sufficiency, and application of policies and procedures. Also, we specifically evaluated an allegation that the settlement of an enforcement action involving Constellation Energy Commodities Group, Inc., (Constellation) was inappropriately linked to a then-pending request for a merger between Constellation and the Exelon Corporation (Exelon). Specifically, the Senators expressed their concern that Constellation's agreement to settle the enforcement action was provided in exchange for FERC's approval of the merger (referred to as quid pro quo).

We found that that the Constellation-Exelon merger was specifically mentioned in the terms of the FERC/Constellation settlement agreement. Further, we determined that even before the merger was approved, Exelon executives were directly involved in the settlement negotiations. Finally, we note that the approval of the merger by FERC and the consummation of the enforcement settlement agreement took place on the same day. The lingering question was whether these actions represented an inappropriate quid pro quo. While these actions may have raised understandable concerns, the evidence did not support such a conclusion. In fact, we found that Exelon had specifically asked for language in the settlement agreement that linked the effective date of the settlement with the effective date of FERC's approval of its merger with Constellation. This matter is discussed more fully on pages 6 and 7 of the report. This also includes certain insights as to Exelon's apparent thought process in this regard.

In addition to the issues we specifically evaluated, there were several that we were unable to review. Those concerns related to what was essentially the basic fairness of FERC's enforcement authority/processes. We concluded that these matters were public policy questions which, as important as they may be, are best addressed by policy makers and as such, were outside the purview of the OIG.

As previously noted, nothing came to our attention to indicate that OE was not performing enforcement activities in accordance with relevant policies and procedures. Accordingly, we make no recommendations in this case.

MANAGEMENT RESPONSE

As no recommendations were made in this special report, formal management comments are not required. However, management provided informal comments that we considered in preparing our final report.

cc: Secretary of Energy
Deputy Secretary of Energy
Executive Director, Federal Energy Regulatory Commission
Director, Office of Enforcement, Federal Energy Regulatory Commission

SPECIAL REPORT: ENFORCEMENT ACTIVITIES CONDUCTED BY THE FEDERAL ENERGY REGULATORY COMMISSION

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ENFORCEMENT ACTIVITIES CONDUCTED BY THE FEDERAL ENERGY REGULATORY COMMISSION

REVIEW OF ENFORCEMENT ACTIVITIES

The Office of Enforcement (OE) initiates and executes investigations of possible violations of the statutes administered by the Federal Energy Regulatory Commission (FERC) and the rules, orders, and regulations issued thereunder. These investigations are initiated based on information received through a variety of sources. Resolution of the investigative cases we reviewed ranged from those closed without fines to settlements involving fines of several hundred million dollars. A detailed flowchart explaining the OE investigative process is included in Appendix 2.

On our own initiative and in response to requests by certain members of the U.S. Senate, we conducted a targeted review of FERC's enforcement activities. We reviewed OE's policy statements and procedures, closed investigations, and hotline and self-report cases. We also conducted interviews of OE officials and FERC Commissioners. Based on our review, nothing came to our attention to indicate that OE had not performed enforcement activities in accordance with relevant policies and procedures.

Also, based on concerns expressed to us, we specifically evaluated an allegation that the settlement of an enforcement action involving Constellation Energy Commodities Group, Inc., (Constellation) was inappropriately linked to a then-pending request for a merger between Constellation and the Exelon Corporation (Exelon). Specifically, we were asked to determine whether Constellation's agreement to settle the enforcement action was provided in exchange for FERC's approval of the merger (that is, essentially a quid pro quo). We could not confirm that the merger was a factor in the investigation settlement negotiations between FERC and Constellation.

Specifics regarding the policies and procedures we evaluated and the results of our efforts are detailed in the remainder of this report.

Policies and Procedures

We found that FERC's policies and procedures related to enforcement activities have evolved in the 10 years following enactment of the *Energy Policy Act of 2005* (EPAAct 2005). A summary of key policies and procedures follows:

- October 2005: Policy Statement on Enforcement addressed the factors FERC took into account in determining remedies for violations, including applying the enhanced civil penalty authority provided by EPAAct 2005. The stated purpose of this Policy Statement was to provide guidance for firm, but fair enforcement of FERC rules and regulations, and to provide notice to entities subject to FERC's jurisdiction of the consequences of violating the statutes, orders, rules and regulations FERC enforces.

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- May 2008: Revised Policy Statement on Enforcement provided guidance to the regulated community as to enforcement policies concerning FERC's governing statutes, regulations, and orders. Included in this Policy Statement was information regarding FERC's 2 years of experience in applying its enhanced enforcement tools under EPAct 2005.
 - October 2008: Policy Statement on Compliance provided additional guidance to the public on compliance with FERC's governing statutes, regulations, and orders. According to this Policy Statement, FERC indicated that it was in the public interest to encourage companies subject to its regulatory requirements to develop rigorous compliance programs that would help minimize the potential for violations of applicable requirements, and to give mitigation credit to those programs when FERC determines whether to assess a civil penalty or other remedy for a violation.
 - December 2009: Policy Statement on Disclosure of Exculpatory Materials provided guidance for disclosing exculpatory materials during investigations. Exculpatory material is evidence that tends to excuse, justify, or absolve the alleged fault or guilt of a defendant or the subject of an investigation. FERC decided that, while not constitutionally mandated, to promote fairness in enforcement actions, exculpatory materials should be provided to subjects during investigations, applying a principle established in a Supreme Court decision. Although not directly relevant to FERC proceedings because it does not deal with criminal prosecutions, the Supreme Court in *Brady v. Maryland* (1963) held that the Government was required to provide criminal defendants with exculpatory or potentially exculpatory evidence that is "material to guilt or punishment."
 - March 2010: Policy Statement on Penalty Guidelines provided guidance on FERC's penalty determinations to promote greater consistency by basing penalties on a set of uniform factors that were assigned transparent values and weighted similarly for similar types of violations and similar types of violators. Upon issuance of the Penalty Guidelines, industry and the public advocated for an opportunity to provide input. In response, the Penalty Guidelines were subsequently suspended to provide a comment period for industry and the public.
 - September 2010: Revised Policy Statement on Penalty Guidelines addressed comments on the guidelines issued in March 2010. The revised guidelines stated that FERC had considered a broad range of comments and recommendations from various segments of the energy industry, and these comments had led to a number of important modifications to the Penalty Guidelines.
 - July 2011: Procedures for Conducting Investigations provided internal rules and protocols governing OE, as well as guidance for initiating and conducting investigations. This manual reflected internal policy and is not a public document. The manual states that each investigation is unique and will present novel challenges requiring flexibility and innovation by staff.

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- June 2013: Office of Enforcement Desk Reference provided the major statutory provisions, rules, regulations, and orders related to OE's investigative and enforcement responsibilities.

Key Components of the Investigative/Enforcement Process

Our audit focused on six key components of OE policies and procedures:

- Oversight of Investigative Activities
- Access to Depositions
- Access to Exculpatory Material
- Confidentiality of Nonpublic Information
- Consistency in the Treatment of Subjects of Investigations
- Notice Given to Subjects of Investigations

Oversight of Investigative Activities

We found that OE had policies and procedures that require oversight and approval at various stages of an investigation. To open an investigation, OE staff obtained the approval of their immediate director, and in some cases, the Director of OE. To convert a hotline call or self-report into an investigation, or to close an investigation without any action, OE staff also obtained approval from their immediate director. Issuing a Notice of Alleged Violations or an Order to Show Cause required approval by FERC Commissioners.^{3,4} In order for staff to engage in settlement discussions with subjects of an investigation, the Commission Chairman must provide approval. Additionally, if staff and the subject of an investigation agree on a settlement, the Commission must provide its approval. Occasionally, OE staff may find new information after settlement terms have been approved that justifies settling on new terms. In these cases, senior staff will confer with the Chairman and seek approval for proposing a new settlement agreement. We noted multiple instances of such approvals in our review of documentation related to closed cases.

We also found that, as an additional level of oversight and review, OE staff produces an internal, nonpublic status report that covers investigations and self-report cases. This report is distributed throughout OE and to the Commissioners and their assistants, as well as senior staff in other offices within FERC. This report allows all internal stakeholders to be apprised of investigative activities.

³ A Notice of Alleged Violations is issued to inform the public that FERC is investigating an individual or company with respect to a specified subject matter. It is issued after OE staff provide their preliminary conclusions to the subject of an investigation, and the subject has had the opportunity to respond.

⁴ An Order to Show Cause is issued by FERC when settlement negotiations fail between FERC and the subject of the investigation. It directs subjects to show why they are not guilty of violating FERC's regulations, and why they should not be assessed penalties.

Access to Depositions

We found that there were regulatory provisions and OE-specific policies and procedures that address access to depositions taken by FERC. Under 18 CFR 1b.12, deponents and their counsel may make a written request for a copy of deposition transcripts during investigations. Per FERC's policies and procedures, copies may be given to witnesses, provided appropriate safeguards are in place and the appropriate fee is paid to the court reporting firm. According to 18 CFR 1b.12, however, staff may also find good cause not to provide a deponent or counsel with a copy of a deposition transcript until after the nonpublic investigation has been completed.

During the course of our review, we observed in one instance that a deposition transcript was made available to the subject of an investigation. In a different case, we noted that a determination was made at the Commissioner level, and a nonpublic order was issued formally denying the request to provide transcripts to a subject until the investigative team had completed all of the depositions in the investigation. In the situation where FERC initially withheld the deposition, it noted that it did so to allow all depositions to be completed to reduce the possibility that witnesses would tailor their testimony to previous testimony.

Access to Exculpatory Material

We found that OE had policies and procedures regarding the release of exculpatory material to subjects of investigations. OE had a training manual that specifically addressed FERC's requirements for handling exculpatory material. Its investigations manual also provided guidance to staff regarding the procedures for handling exculpatory information. Specifically, the manual reiterates FERC's policy statement on exculpatory material, which states that over the course of an investigation, OE should scrutinize investigative materials for exculpatory evidence received from sources other than the subject. Any such materials or information that is not known to be in the subject's possession shall be provided to the subject. Additionally, the manual directs staff to err on the side of fairness when considering disclosure of exculpatory evidence.

We found in one case that OE had provided exculpatory materials in response to a subject's request. Later in the investigation, OE was in the process of preparing additional exculpatory materials even before it had received a second request from the subject. We found instances where there was a misunderstanding on the part of the subject of investigation as to what was considered exculpatory material. In one instance, in spite of a determination that particular case material was not exculpatory, FERC nonetheless provided the requested information to the subject of the investigation as a courtesy. We found in another situation, a subject's request for information was denied, in part, due to the timing of the request. Staff stated that had the investigation reached preliminary findings stage at the time of the request, the information would have been provided to the subject.

Confidentiality of Nonpublic Information

Based on our review of OE's enforcement activities and interviews conducted with staff, we found there were both regulatory provisions and OE-specific policies and procedures that

addressed the confidentiality of nonpublic information. Pursuant to 18 CFR 1b.9, all information and documentation received during an investigation, as well as the existence of an investigation, is treated as nonpublic information. Disclosure of nonpublic information is only permitted at the Commissioners' direction or authorization, during the course of an adjudicatory proceeding, or when required by the *Freedom of Information Act*. However, as discussed later, a recent Office of Inspector General (OIG) review found that there were inconsistencies and weaknesses in FERC-wide postemployment guidance and exit processes regarding the handling of nonpublic information.

Typically, the public is first made aware that an entity is being investigated by FERC only after a Notice of Alleged Violations has been issued. Per OE's Procedures for Conducting Investigations, the Notice should contain (1) the identity of the entity or entities that are the subject of an investigation; (2) the time and place of the alleged conduct; (3) the rules, regulations, statutes, or orders that staff alleged were violated; and (4) a concise description of the alleged wrongful conduct. The notice is issued to educate the public as to the nature of violations under investigation by FERC and to provide an opportunity for the public to submit information that may be relevant to the investigation.

Pursuant to 18 CFR 1b.20, persons compelled by FERC to produce documents in an investigation are allowed to claim that some or all of the information contained in a particular document is exempt from mandatory public disclosure requirements. 18 CFR 1b.20 also states that FERC retains the right to make the determination with regard to any claim of confidentiality and must give 5 days' notice before disclosing any nonpublic information. OE's investigations manual reiterates the statutory guidance provided by 18 CFR 1b.9 and 1b.20 and requires staff to obtain approval from FERC Commissioners if subjects of an investigation do not consent to the disclosure of nonpublic material.

OE staff indicated that documents received from companies are considered confidential. We found that OE maintains a document management system that restricts investigation case access to relevant personnel. Over the course of our review, all documentation provided to us by staff was appropriately labeled when the material was nonpublic and confidential.

While our review found there were regulatory provisions and OE-specific policies and procedures that address the confidentiality of nonpublic information, a recent OIG Management Alert, *Review of Allegations of Improper Disclosure of Confidential, Nonpublic Federal Energy Regulatory Commission Information* (DOE/IG-0939, June 2015), found that Mr. Jon Wellinghoff, a former FERC chairman, improperly disclosed nonpublic information after he left FERC. The review found that there were inconsistencies and weaknesses in FERC's postemployment guidance and exit processes with regard to the handling of nonpublic information. Specifically, postemployment guidance only addressed how nonpublic information should be handled by current FERC employees. Additionally, the exit process did not adequately address how employees leaving FERC should treat nonpublic information. As a result of the incident with Mr. Wellinghoff, FERC agreed to take corrective actions to address these deficiencies.

Consistency in the Treatment of Subjects of Investigations

Based on our review of a sample of closed investigations and FERC internal status reports, nothing came to our attention to indicate FERC enforcement activities were not consistently applied against each case. Although each investigation we reviewed was unique, we identified common steps, documentation, and application of FERC policies and procedures. We found that each investigation had a resolution and that actions taken to resolve investigations were consistent with OE's policies and procedures. We also reviewed comprehensive monthly and quarterly internal reports that provided updates regarding the status and milestones of investigations.

Notice Given to Subjects of Investigations

We found that OE's policies and procedures required, and FERC staff had consistently given, notice to subjects of investigations when investigatory actions were initiated. OE officials stated they informed regulated entities early on in the investigative process that an investigation was being opened. The officials also stated that OE is very open about the case subject matter. According to its investigations manual, as soon as OE believes it may investigate an entity, which may occur even before opening the matter formally, it is required to send a Data Preservation Letter citing 18 CFR 1b of FERC's regulations and direct the recipient not to destroy documents regarding a specified matter. For the investigations we reviewed, we found that early on in the investigatory process, OE had consistently sent a Data Preservation Letter informing the entity that FERC was either conducting, or determining whether to conduct, an investigation of the entity.

Alleged Quid Pro Quo

In response to allegations that the settlement of the Constellation enforcement action and the Exelon merger request were improperly linked, and as part of our sample of closed investigations, we selected the investigation of Constellation. While this investigation was taking place, a pending merger of Constellation and Exelon was being reviewed at FERC. We found that each matter was handled by a different office within FERC and we were unable to establish that a quid pro quo, the approval of the merger by FERC in exchange for Constellation agreeing to settle the enforcement action, had taken place.

Although we could not confirm that the merger was a factor in the investigation settlement negotiations between FERC and Constellation, we determined that the merger was mentioned in the terms of the settlement agreement between FERC and Constellation and that Exelon had been involved in the settlement negotiations. In fact, we established that Exelon had specifically asked for language in the settlement agreement that linked the effective date of the settlement with the effective date of the merger between Constellation and Exelon. We also noted that the approval of the merger and the settlement of the enforcement action took place on the same day. Given these circumstances, it is understandable that those not directly involved in the process may have arrived at the conclusion that there was a direct connection between what we found to be separate, mostly independent processes/events.

OE personnel stated that initial settlement negotiation meetings between Constellation and FERC were not fruitful and that it was not until attorneys for Exelon took the lead on Constellation's behalf that a settlement was able to be reached. A FERC Commissioner indicated that Exelon had an incentive to reach a settlement because it would have wanted to know in advance the amount of the liability if it merged with Constellation. FERC officials also told us that Exelon wished to be mentioned in the settlement agreement because Exelon would be responsible for ensuring payment terms and compliance requirements were met if the merger were approved. A FERC official indicated this was the same reason for Exelon's participation in settlement negotiations (participation that FERC Commissioners specifically approved).

We found no indication that OE had considered the merger during its investigation. In fact, we found that OE attorneys involved with this investigation were given specific instructions not to take into account the pending merger during settlement negotiations. We also found that the determination of whether the merger was consistent with the public interest was made by a separate FERC organization, the Office of Energy Market Regulation. During our review of documentation related to the merger, we discovered nothing to suggest that the then-pending Constellation enforcement action played any type of role in the determination that the merger between Constellation and Exelon was consistent with public interest.

In addition to reviewing a large amount of documentary evidence and interviewing a number of FERC staff members, we interviewed the attorneys assigned to the Constellation investigation, the former and current Directors of OE, as well as two Commissioners who were on the Commission at the time of the decision. While several of the interviewees suggested that the optics of the timing of the merger approval and the enforcement action were unfortunate, our interview process provided no direct evidence of an inappropriate quid pro quo.

We did, however, find that FERC officials, including staff of former Chairman Wellinghoff, had internal discussions and performed internal analyses regarding whether a pending nonpublic OE investigation of one of the entities involved in a proposed merger could be a factor in merger approval decisions. Staff of FERC's Office of the General Counsel concluded in their analysis that taking such action would go against existing precedent and require a rulemaking proceeding. FERC OE officials told us that ultimately no action was taken on the matter and the investigation and merger approval process continued separately.

CONCLUSION

FERC, through its enabling legislation, has been granted significant regulatory and enforcement authority. In this context, we concluded that reasonable people can disagree as to how this authority is to be exercised. However, based on the totality of our reviews, nothing came to our attention to indicate that FERC's enforcement practices were inconsistent with its own operating policies and procedures.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

To conduct a review of the Federal Energy Regulatory Commission's (FERC's) enforcement activities and related policies and procedures.

Scope

This review was conducted between October 2014 and September 2015, at FERC headquarters in Washington, DC. The scope was focused on FERC's Office of Enforcement's (OE's) enforcement activities between fiscal years 2010 and 2014. The review was conducted under the Office of Inspector General project number A15HQ007.

Methodology

To accomplish the review objective, we:

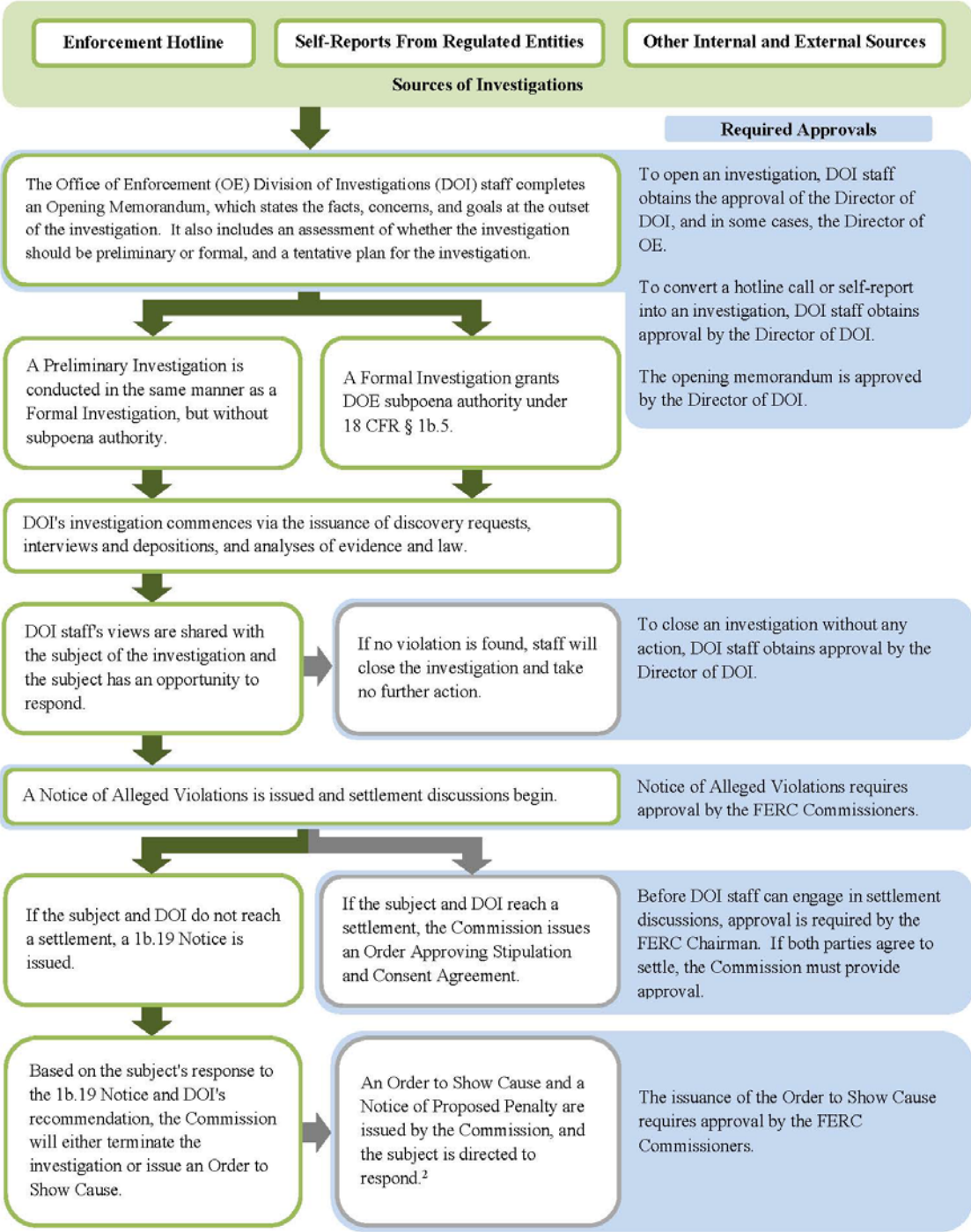
- Identified and reviewed statutory laws and policies and procedures relating to FERC's OE which included, but were not limited to:
 - The *Federal Power Act of 1935*, the *Natural Gas Act of 1938*, the *Natural Gas Policy Act of 1978*, and the *Energy Policy Act of 2005*;
 - Policy Statements for enforcement, penalty guidelines, exculpatory materials, and compliance; and
 - Procedures for conducting investigations;
- Judgmentally selected a sample of seven closed investigations, to include (1) investigations initiated from a variety of sources, (2) entities of varying sizes and types, and (3) resolutions ranging from closure without fines to fines of several hundred million dollars;
- Randomly selected 20 hotline cases and 10 self-report cases and reviewed each case based on internal policies, procedures, and guidance;
- Gained an understanding of OE's organizational structure; and
- Interviewed FERC personnel to include members of all OE divisions and several Commissioners.

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 observations and conclusions based on our audit objective. We believe that the evidence obtained provides a

reasonable basis for our conclusions based on our audit objective. Accordingly, the audit included tests of controls and compliance with laws and regulations necessary to satisfy the audit objective. We also assessed OE's compliance with the *GPRRA Modernization Act of 2010* and found that performance measures had been established to assist in measuring the effectiveness of OE's enforcement activities. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. Finally, we concluded that a data reliability assessment did not need to be conducted for this audit because computer-processed electronic data was not used in reaching our conclusions.

FERC management waived an exit conference.

INVESTIGATIONS FLOWCHART¹



¹ Based on OE's July 2011 Procedures for Conducting Investigations Manual.
² The precise path of the matter after the Commission receives a response to an Order to Show Cause depends upon the regulation under which it is issued; it may be brought before an Administrative Law Judge, or U.S. District Court.

PRIOR REPORT

Management Alert on [Review of Allegations of Improper Disclosure of Confidential, Nonpublic Federal Energy Regulatory Commission Information](#) (DOE/IG-0939, June 2015). On March 9, 2015, Mr. Jon Wellinghoff, who served as Commission Chairman from 2009 to 2013, moderated a panel discussion at a public conference at which he shared a video excerpt of a nonpublic deposition taken during a major Office of Enforcement (OE) investigation. At the time of the investigation, which was resolved through a July 2013 agreement, Mr. Wellinghoff was the Federal Energy Regulatory Commission's (FERC) chair. The review confirmed the essence of the allegation, finding that Mr. Wellinghoff had, in fact, disclosed nonpublic OE information in a public setting. The review concluded that the disclosure of such information could threaten the integrity of FERC's regulatory and enforcement processes. The review found that when advised of the matter, Commission staff took steps to restrict further public disclosure of the video excerpt by Mr. Wellinghoff and conference organizers. However, the review determined that additional actions were necessary to preclude improper disclosures of confidential, nonpublic information in the future.

FEEDBACK

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Office of Inspector General (IG-12)
Department of Energy
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If you want to discuss this report or your comments with a member of the Office of Inspector General staff, please contact our office at (202) 253-2162.