

OFFICE OF INSPECTOR GENERAL U.S. Department of Energy



FOLLOWUP ON COOPERATIVE RESEARCH AND DEVELOPMENT AGREEMENTS AT NATIONAL LABORATORIES



Department of Energy Washington, DC 20585

March 5, 2018

MEMORANDUM FOR THE UNDER SECRETARY OF ENERGY UNDER SECRETARY FOR SCIENCE ADMINISTRATOR, NATIONAL NUCLEAR SECURITY ADMINISTRATION

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FROM: Michelle Anderson Deputy Inspector General for Audits and Inspections Office of Inspector General

SUBJECT: <u>INFORMATION</u>: Audit Report on "Followup on Cooperative Research and Development Agreements at National Laboratories"

BACKGROUND

One of the Department of Energy's top priorities is the transfer or dissemination of technology it develops. Under the *National Competitiveness Technology Transfer Act of 1989*, the Department's contractor-operated laboratories are authorized to use Cooperative Research and Development Agreements (CRADAs) to facilitate the development and transfer of technology to the general science community, private firms, and the public. Department site offices are responsible for ensuring laboratories provide final reports documenting the results of research to the Department's Office of Scientific and Technical Information (OSTI). OSTI is responsible for preserving the scientific and technical information and making it publicly available. The Department's laboratories had approximately 1,600 active CRADAs between fiscal years 2013 and 2015.

The Office of Inspector General (OIG) previously issued three reports related to CRADAs. Our reports *Cooperative Research and Development Agreements at National Nuclear Security Administration Laboratories* (OAS-M-13-02, March 2013) and *Cooperative Research and Development Agreements at the Department of Energy's Office of Science Laboratories* (DOE/IG-0826, September 2009) found that National Nuclear Security Administration (NNSA) and Office of Science (Science) laboratories had not always received final reports from researchers and/or had not transmitted the reports received to OSTI. Further, our report *Public Dissemination of Research Results* (DOE/IG-0912, May 2014) noted that final reports received by OSTI were not always publicly available. We initiated this follow-up audit to determine whether the Department effectively and efficiently managed CRADAs at its laboratories.

RESULTS OF AUDIT

While the awarding, funding, and approval of CRADAs generally adhered to Departmental requirements, the Department and its laboratories had not taken sufficient corrective action to

address previously identified weaknesses in the management of final technical reports. Similar to the weaknesses identified in our previous audit reports, we found that CRADA offices at the laboratories reviewed, Argonne National Laboratory (Argonne), Los Alamos National Laboratory (Los Alamos), and the National Renewable Energy Laboratory (NREL), had not received,¹ processed, and forwarded final reports to OSTI as required. Additionally, in our current audit, we found that the majority of final technical reports reviewed did not meet Department requirements. Furthermore, the Department had still not always disseminated final reports received by OSTI following the expiration of the statutory data protection period, which should not exceed 5 years, as reported in our prior reports.

Management of Final Reports

Our current review found that the CRADA offices at the laboratories reviewed had not received and forwarded all final reports to OSTI as required. Receiving final reports from researchers and forwarding them were noted as issues in our prior reports; however, based on responses provided by management on prior recommendations, these issues were determined by management to be remediated. Department Order 483.1A, *DOE Cooperative Research and Development Agreements*,² requires a final report from the CRADA parties, to include a list of subject inventions, upon the completion or termination of every CRADA. The CRADA parties are the researchers from the laboratory led by a Principal Investigator and the non-Federal participant collaborating on the research project. A CRADA office within the laboratory is typically responsible for collecting and forwarding the final reports to OSTI, which manages the Department's official repository of reports. Ultimately, OSTI is responsible not only for preserving the scientific and technical information generated through the CRADAs, but also making this information readily available to the scientific community and the public.

The following table illustrates the results of our review of 45 completed or terminated CRADAs (15 from each laboratory) to determine whether final reports were received, met Department requirements, and were forwarded to OSTI.

Table 1: Sample of 45 Completed or Terminated CRADAsFiscal Years 2013 – 2015			
	Final Reports	Final Reports Not	Final Reports Sent
	Received by the	Meeting	to OSTI Prior to
	CRADA Office	Requirements	Audit
Argonne	12	9	0
NREL	14	13	14
Los Alamos*	0	14	0
Totals	26	36	14

*None of the 15 CRADAs in the Los Alamos sample had a report prepared by the CRADA parties. Los Alamos' CRADA office officials prepared 14 final reports in-house that we evaluated for compliance with requirements.

As noted above, none of the CRADA offices at the three laboratories received all of the required

¹ Under a CRADA, a Principal Investigator at the laboratory works jointly with an outside party to conduct research. Both parties are jointly responsible for producing the final report. A CRADA office at each laboratory is typically responsible for receiving those reports and forwarding them to OSTI.

² Department Order 483.1A, in place at the beginning of our audit, was subsequently superseded by Department Order 483.1B on December 20, 2016. The revised Department Order contains similar requirements to produce and forward CRADA final reports to OSTI for dissemination.

final reports from the CRADA parties. Specifically, we found that of the 45 completed or terminated CRADAs sampled, only 26 final reports (58 percent) were received from the CRADA parties. Argonne's CRADA office did not receive three final reports for completed CRADAs. Furthermore, while NREL's CRADA office received reports for all completed CRADAs, it did not receive one final report for a terminated CRADA. Officials within the Los Alamos' CRADA office told us they had 14 final reports; however, we learned that, instead of being received from the CRADA parties, all of the final reports were prepared in-house by the CRADA office officials without the Principal Investigators' input and were forwarded to OSTI after we announced our audit. Department Order 483.1A requires the CRADA parties to prepare the final report. However, Los Alamos' CRADA office officials stated that our audit visit and sample prompted them to review their files and then prepare the missing reports. In addition, Los Alamos was unable to locate one of the requested CRADA agreement files.

We also found the majority of final reports we reviewed did not meet Department requirements. According to the guidance in Department Order 483.1A, final reports, to include a list of subject inventions, must fully cover and describe the research done under the CRADA, incorporating technical data as needed to support conclusions, and including protected CRADA information as appropriate. Based on our review of 40 final technical reports, 26 received from the CRADA parties and 14 prepared by Los Alamos CRADA program officials, we found:

- That 22 of the 26 final reports received by Argonne's and NREL's CRADA offices did not sufficiently describe the research, detail data collected, or conclusions drawn. We found that some laboratory officials improperly instructed their CRADA parties not to include information in final reports that the CRADA participants wanted protected. By entering into a CRADA, the participants acknowledge that information generated under the CRADA may be protected from public disclosure for a period of time not to exceed 5 years. During this period, however, Federal Government employees have access to the protected information. These instructions essentially granted the CRADA participants an indefinite protection period from the public and Federal Government employees.
- The 14 final reports created by Los Alamos' CRADA office officials did not meet the Department Order 483.1A requirements and simply stated: "All agreement tasks and deliverables were completed per the CRADA's statement of work." Further, 2 of the 14 final reports did not list possible inventions identified by the Principal Investigator, an oversight according to a Los Alamos official. A Los Alamos official stated that they completed the reports because the CRADA partners were hesitant to release information to the public when working with the laboratories. However, the interpretation by CRADA parties does not recognize that CRADAs were created with the intent of developing and transferring technology to non-Department entities for the public's benefit and to enhance the accomplishments of Department missions.

Finally, the laboratories had not always forwarded final technical reports to OSTI in a timely manner. Department Order 483.1A specified that a final report must be provided to OSTI at the completion of the CRADA. However, neither Argonne's nor Los Alamos' CRADA offices submitted any of the final reports selected for review until after our audit was announced. Although subsequently submitting 11 of 12 final reports, Argonne took between 299 and 1,421 days from the end-date of the project to submit final reports to OSTI. Further, Los Alamos' final

reports were long overdue when the CRADA office officials decided to prepare them in-house. In the best case, it was over 3 years between the end of the CRADA project in June 2013 and the submission of the in-house final reports to OSTI in November 2016. In one extreme example, the CRADA research had been completed in 2005. Finally, while NREL forwarded all 14 of the reports it had to OSTI, the submission was not timely. Specifically, NREL submitted reports to OSTI between 84 and 484 days from the completion of the project.

Dissemination of Research Results at OSTI

The Department and its laboratories had not always disseminated final reports publicly following the expiration of the statutory data protection period. Although noted in our prior reports and acknowledged by Department management as an issue, the Department had yet to implement requirements noted in Department Order 483.1A that specifies final reports may be protected from public dissemination for a period not to exceed 5 years. As of February 2017, 382 reports Department-wide had reached or exceeded the 5-year time limit and had not been made publically available. We noted that 159 of these unreleased reports, or about 40 percent, were from NNSA's Lawrence Livermore National Laboratory and Sandia National Laboratories, which we did not visit during the audit. The 382 reports also included 3 reports from Argonne, 1 report from NREL, and 4 reports from Los Alamos. It should also be noted that, contrary to Department Order 483.1A, Los Alamos' CRADA Manager decided to protect all final CRADA reports from release for the maximum 5-year period even though the reports contained no information requiring protection or indication that the partner requested protection. Argonne and NREL, on the other hand, stated in the CRADA reports or instructions not to include protected CRADA information and, therefore, decided not to protect any recent CRADA reports.

Of particular concern, we had identified and reported on 283 of these 382 unreleased reports in our previous audit report *Public Dissemination of Research Results*. Three years later, these final reports remained unreleased although the protection period had expired and no other restrictions on release existed. According to CRADA officials at Lawrence Livermore National Laboratory, no individual had been assigned responsibility for releasing reports. Further, at Sandia National Laboratories, we learned that OSTI's list of releasable reports went to a person without authority to release CRADA reports. According to Sandia National Laboratories officials, in their opinion, OSTI was responsible for determining which reports to release.

Prior Corrective Actions

The issues identified persisted primarily because the collection and dissemination of CRADA final reports were not a management priority. The Department had not ensured that all corrective actions to address weaknesses identified in prior OIG reports had been implemented at site/field offices. Specifically, since 2009 the OIG has issued three reports related to CRADAs. Each report provided recommendations to various Department programs, to include NNSA, Science, and OSTI, that if implemented would have improved the receipt, forwarding, and dissemination of final reports. The report *Cooperative Research and Development Agreements at the Department of Energy's Office of Science Laboratories* recommended that the Deputy Director

for Field Operations, Science, direct the site offices to: verify that the laboratories establish policies to require researchers to transmit final CRADA reports for all completed or terminated CRADAs and periodically review whether the laboratories are receiving and promptly transmitting final CRADA reports to OSTI. For our report, Cooperative Research and Development Agreements at National Nuclear Security Administration Laboratories, we recommended that the Acting Administrator, NNSA, direct all site offices to: verify that the laboratories establish policies to obtain final reports from researchers for all completed or terminated CRADAs and transmit them to OSTI; periodically review whether the laboratories are receiving and promptly transmitting final reports to OSTI; and require the laboratories to determine whether final reports have been received on previously completed or terminated CRADAs, and ensure that any existing final reports are transmitted to OSTI. Finally, our report Public Dissemination of Research Results recommended that the Acting Director, OSTI, establish, in consultation with Department program offices and CRADA sites, a process to facilitate the release of CRADA reports beyond the periods of protection. We noted that all recommendations made were acknowledged by the Programs and per information provided in the Department's recommendation tracking system, corrective actions had been taken. Specifically, Science stipulated the Deputy Director for Field Operations directed the site offices to verify their laboratories established policies requiring researchers to transmit final CRADA reports for all completed or terminated CRADAs, and review whether their laboratories received final CRADA reports and promptly disseminated the reports to OSTI. Likewise, NNSA stated it was issuing a directive to implement the above-mentioned recommendations. Finally, OSTI said that sites had been provided listings of identified CRADA reports residing at OSTI and these lists were being utilized for site reviews. Also, OSTI said its staff would continue to work with sites to facilitate the release process. Although the Office of Energy Efficiency and Renewable Energy (EERE) was not included in our prior audits, Golden Field Office officials stated that they were aware of our prior reports.

We found that while Science had developed a 2010 Memorandum in response to our report *Cooperative Research and Development Agreements at the Department of Energy's Office of Science Laboratories*, the direction provided by the 2010 Memorandum was not incorporated into the local procedures for administering CRADAs at the Argonne Site Office. The 2010 Memorandum directed Science's site office managers to verify that laboratories had policies in place to ensure that researchers transmitted their final reports for all completed or terminated CRADAs. Additionally, the site office managers were to conduct periodic reviews on whether the laboratories received and promptly transmitted final reports to OSTI. Implementation of the 2010 Memorandum developed by Science may have improved the collection and dissemination process of final technical reports at Science laboratories. During our audit, Argonne management noted that its CRADA process for the period under our review was not as robust as it was as of September 2017. Management stated it made improvements to its final report preparation and submission process since that period.

Similarly, NNSA's Los Alamos Field Office had not performed any reviews of Los Alamos' CRADA process to ensure that final reports were received or sent to OSTI, despite the recommendation to do so in our prior report, *Cooperative Research and Development Agreements at National Nuclear Security Administration Laboratories*. We found that while NNSA officials had forwarded the report to the Los Alamos field office; the Program Office

provided no additional guidance and did not verify that corrective actions, such as the establishment of new policies, occurred. An NNSA official stated that individuals associated with the prior report had either retired or left the agency, and no evidence existed of actions taken to ensure laboratories reviewed their CRADA processes. Additionally, while recommendations were made for site/field offices to periodically review whether laboratories were receiving and transmitting final reports to OSTI, our results described above provide evidence that the Field Office had not implemented corrective actions to address our prior recommendations.

Additionally, these issues occurred because the Department had not ensured that a prior recommendation was fully implemented regarding the dissemination of research results from OSTI. In response to our prior report, Public Dissemination of Research Results, OSTI provided additional guidance to CRADA sites, set up automated emails to be generated at the end of the protection periods, and expanded the lists of potentially releasable reports it sent to the laboratories. Overall, it is incumbent upon the laboratories to notify OSTI when reports may be released. However, not all laboratories took appropriate action to notify OSTI to release reports that had passed the period of protection. For example, of the 382 current unreleased final reports, 153 or about 40 percent were from NNSA's Lawrence Livermore National Laboratory and Sandia National Laboratories, indicating that these 2 laboratories took little or no action to effect the release of reports since our last audit. After discussions with officials from both laboratories, we determined that their processes for releasing reports were still incomplete. As discussed previously, according to Lawrence Livermore National Laboratory CRADA officials, no individual had been assigned responsibility for releasing reports. At Sandia National Laboratories, OSTI's list of releasable reports went to a person without authority to release CRADA reports and Sandia National Laboratories officials informed us that OSTI was responsible for determining which reports to release. However, existing guidance establishes that the laboratories are responsible for determining, and alerting OSTI, when reports can be released to the public. To their credit, Science's Brookhaven and Oak Ridge National Laboratories took action on previous recommendations, releasing 101 final reports that had been identified in the previous audit.

Guidance

We found that the Department had not provided sufficient guidance on certain CRADA processes as recommended in our 2009 report. While Department Order 483.1A directs site/field offices and laboratories as to the timing requirements for final technical reports, guidance pertaining to the review periods for laboratories prior to submitting to OSTI does not exist. Similarly, OSTI's listings of potentially releasable reports did not specify timeframes for the laboratories to complete reviews. Also, an Office of General Counsel official stated that reviewing whether final reports are acceptable prior to submission to OSTI sounded like a best practice, however, no guidance to perform such reviews had been issued to the Department's offices or laboratories. For example, the Golden Field Office's CRADA policy did not require a review of final reports to ensure that they met requirements. Had such reviews been performed, they may have identified the lack of research and technical data, including protected CRADA information that was required to be in the final reports.

Impact

By not ensuring that its laboratories obtained and disseminated final reports, the Department has not ensured that the scientific and technical information generated by CRADAs was available throughout the Department, the scientific community, and the public. These final reports are not merely evidence of the work product but serve to document the approach and accomplishments under the CRADA, which are vital elements in the effort to transfer the technology as efficiently and effectively as possible. Furthermore, by not disseminating final reports, the Department has not ensured that research results produced the maximum return on taxpayer investment.

RECOMMENDATIONS

We recommend that the Deputy Director for Field Operations, Office of Science; the Deputy Assistant Secretary for Operations, Office of Energy Efficiency and Renewable Energy; and the Assistant Deputy Administrator for Strategic Partnership Programs, National Nuclear Security Administration; ensure that site/field offices:

- 1. Develop and implement procedures to periodically review whether the laboratories' CRADA Offices are receiving and forwarding final CRADA reports to OSTI in accordance with applicable Department Orders;
- 2. Develop and implement procedures to verify final CRADA reports include a list of subject inventions that fully cover and describe the research done under the CRADA, incorporating technical data as needed to support conclusions, including protected CRADA information as appropriate;
- 3. Ensure future final reports produced by CRADAs are disseminated when eligible; and
- 4. Eliminate the backlog of final reports that remain to be disseminated.

We also recommend the Director, Office of Technology Transitions, in conjunction with the Office of General Counsel:

5. Clarify the guidance regarding the timing of reviews and the sufficiency of final reports.

MANAGEMENT RESPONSE

Management concurred with the report's recommendations and indicated that corrective actions had been initiated or were planned to address the issues identified in the report. To address our recommendations, management stated each laboratory steward had identified plans to ensure that final CRADA reports are received, reviewed, forwarded, and disseminated when appropriate. The stewards will additionally direct and oversee their laboratories' actions to ensure the elimination of any backlog of final reports to be disseminated. In addition, the Office of Technology Transitions will coordinate with Office of General Counsel, the stewards, and their laboratories to develop and disseminate guidance as appropriate. Management Comments are included in Appendix 3.

AUDITOR COMMENTS

We consider management's comments and corrective actions to be responsive to our recommendations. We recognize that management had already taken some actions to improve processes in response to our audit work.

Attachments

cc: Deputy Secretary Chief of Staff Acting General Counsel

OBJECTIVE, SCOPE, AND METHODOLOGY

OBJECTIVE

We conducted this audit to determine whether the Department of Energy effectively and efficiently managed Cooperative Research and Development Agreements (CRADAs) at its laboratories.

<u>SCOPE</u>

We conducted the audit between September 2016 and March 2018. The scope of the audit was limited to active and completed CRADAs for fiscal years 2013 through 2015. We conducted work at the National Renewable Energy Laboratory and the Golden Field Office in Golden, Colorado; the Los Alamos National Laboratory and Los Alamos Field Office in Los Alamos, New Mexico; and the Argonne National Laboratory and Argonne Site Office in Argonne, Illinois. We also requested listings of CRADA final reports from the Office of Scientific and Technical Information. Finally, we contacted Lawrence Livermore National Laboratory and Sandia National Laboratories to discuss the process for release of final reports at these laboratories. The audit was conducted under Office of Inspector General project number A16CH059.

METHODOLOGY

To accomplish the audit objective, we:

- Reviewed Federal and Departmental regulations and contractual requirements applicable to CRADAs;
- Reviewed prior Office of Inspector General audit reports and recommendations and followed up on corrective actions;
- Interviewed Office of Technology Transitions, Office of General Counsel, and Office of Scientific and Technical Information officials to discuss CRADA processes;
- Held discussions with responsible Department and contractor personnel to discuss CRADA activities;
- Reviewed CRADA programs, policies, and procedures at the Los Alamos National Laboratory, the National Renewable Energy Laboratory, and the Argonne National Laboratory;
- Obtained and reviewed listings of active CRADAs for fiscal years 2013 through 2015 at Office of Science, Office of Energy Efficiency and Renewable Energy, and National Nuclear Security Administration laboratories;

- Obtained and analyzed listings of 783 unreleased final CRADA reports from the Office of Scientific and Technical Information to determine the number of reports publicly available or not, considering the 5-year protection period for CRADA information;
- Judgmentally selected and reviewed a sample of 60 out of 429 active CRADAs at the three laboratories selected for review for fiscal years 2013 through 2015. The 60 included 20 each at the Argonne National Laboratory, the National Renewable Energy Laboratory, and the Los Alamos National Laboratory. At the time of our review, 265 CRADAs were completed and 164 were still ongoing. The 20 CRADAs from each site included 15 completed and 5 ongoing CRADAs. We selected them based on an analysis of risk factors such as monetary value and age of the CRADAs; and
- For all 60 sampled CRADAs, we evaluated whether the CRADA files complied with requirements, policies, and procedures such as fairness of opportunity, foreign entity disclosures, assessment of administrative fees, identifying equipment used, and listing inventions. For the 45 completed CRADAs, we also determined whether final reports had been received, processed, and forwarded to Office of Scientific and Technical Information. Because our samples were judgmental or non-statistical selections, the results and overall conclusions were limited to the CRADAs tested and could not be projected to the entire population or universe of CRADAs.

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 evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. Accordingly, the audit included tests of controls and compliance with laws and regulations to the extent necessary to satisfy the objective. We considered the *GPRA Modernization Act of 2010* as necessary to accomplish the objective and we determined that the Department has not established performance measures related to CRADAs at the national laboratories. 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 conducted an assessment of computer-processed data relevant to our audit objective by comparing the data to source documents. We determined the data to be reliable for our purposes.

Management officials waived an exit conference on February 22, 2018.

PRIOR REPORTS

- Audit Report on <u>Public Dissemination of Research Results</u> (DOE/IG-0912, May 2014). The audit found that the Department of Energy and its Cooperative Research and Development Agreements (CRADA) sites did not initiate action to release CRADA final reports once statutory data protection periods expired. CRADA reports are protected for 5 years. As of March 2013, there were 408 CRADA reports that had not been publicly released although it was after the respective protection period and there were no other restrictions on releasing the information.
- Audit Report on <u>Cooperative Research and Development Agreements at National</u> <u>Nuclear Security Administration Laboratories</u> (OAS-M-13-02, March 2013). The audit found that National Nuclear Security Administration laboratories were generally managing the use of selected CRADAs in an effective manner. However, the audit noted that controls could be improved in the area of obtaining and disseminating CRADA results. Specifically, National Nuclear Security Administration laboratories had not always obtained final reports from researchers and had not forwarded the reports they did obtain to the Office of Scientific and Technical Information for dissemination.
- Audit Report on <u>Cooperative Research and Development Agreements at the Department</u> of <u>Energy's Office of Science Laboratories</u> (DOE/IG-0826, September 2009). The audit found that although the Office of Science generally managed CRADAs according to Department requirements, it did not always ensure that its laboratories received final reports and forwarded them to Office of Scientific and Technical Information. The audit noted that site offices did not exercise adequate oversight of CRADA activities at the laboratories, and had not established goals and measures to evaluate the success of the laboratories in obtaining the final reports and forwarding them to Office of Scientific and Technical Information.

MANAGEMENT COMMENTS



Department of Energy Washington, DC 20585

February 6, 2018

MEMORANDUM FOR	MICHELLE ANDERSON DEPUTY INSPECTOR GENERAL FOR AUDITS AND INSPECTIONS OFFICE OF INSPECTOR GENERAL
FROM:	CHANETTE ARMSTRONG CLAIN WISTM DIRECTOR, OFFICE OF TECHNOLOGY TRANSITIONS
SUBJECT:	Response to the Office of Inspector General Draft Report on "Follow-up on Cooperative Research and Development Agreements at National Laboratories (A16H0053)"

DOE/NNSA recognizes and acknowledges that preserving and disseminating results from its Laboratories' Cooperative Research and Development Agreements (CRADAs) is a key means of accomplishing technology transfer – an important priority of the Department. Specifically, ensuring that a final report for each CRADA documents the R&D results and any new subject inventions, and that all such reports are submitted to the Office of Scientific and Technical Information (OSTI), facilitates the technology transfer mission when these reports are made readily available to the scientific community and the public.

The Department management concurs with the OIG recommendations to develop and implement procedures for periodic review and to ensure that the laboratories' Offices responsible for CRADAs are receiving and forwarding final CRADA reports to Office of Scientific and Technical Information (OSTI) when appropriate and in accordance with applicable Department Orders. Each laboratory steward has identified a plan to address the recommendations by the end of FY18. The Department management also concurs with and has identified plans to address the OIG recommendation to "[d]evelop and implement procedures to verify final CRADA reports include a list of subject inventions that fully cover and describe the research done under the CRADA, incorporating technical data as needed to support conclusions, including protected CRADA information as appropriate." The stewards will additionally direct and oversee their laboratories' actions to ensure the elimination of any backlog of final reports to be disseminated. In addition, OTT concurs with your recommendation to clarify the guidance regarding the timing of reviews and sufficiency of final reports, and will coordinate with Office of General Counsel, the stewards, and their laboratories to develop and disseminate guidance as appropriate.

FEEDBACK

The Office of Inspector General has a continuing interest in improving the usefulness of its products. We aim to make our reports as responsive as possible and ask you to consider sharing your thoughts with us.

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Office of Inspector General (IG-12) Department of Energy Washington, DC 20585

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.