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U.S. Department of Labor

Office of Inspector General Washington D.C. 20210

June 21, 2022



This is in response to your Freedom of Information Act request that was received by this office on May 9, 2018 and was assigned FOIA case number 218061.

Your request was for a copy of select Inspector General Directives (IGD) for the OIG Records Mgt. Program, Continuity of Operations, Internal Inspection Program, Weekly Significant Activities, Position Management Program, Outside Employment and Activities of OIG Employees, OIG Training System, Media Relations, Independence Committee, Guidelines for the Conduct of Computer Matching, Law Enforcement Authority, and Complaints and Allegations Involving OIG Employees.

The IGDs responsive to your request were located and processed with the exception of one, the IG Directive for the OIG Training System, which was withdrawn in February 2018 and was superseded by the DOL wide training directive. Nonetheless, a thorough search was made of the OIG files in the Department of Human Resources and Office of Congressional and Public Relations and no copies of the superseded IGD were located.

Enclosed are copies of the remaining eleven IG Directives that were requested. Certain information has been redacted for the reasons set forth below. The redactions include the law enforcement techniques and tactical operations procedures training, continuity of operations plan details during emergency situations, names of OIG staff and contact information and information related to agency security procedures and internal operations during various COOP situations.

Exemption (b)(6) authorizes the withholding of names and details of personal information in personnel, medical and similar files, which, if disclosed to the public, would constitute an unwarranted invasion of personal privacy.

Exemption (b)(7)(E) authorizes the withholding of information if its release would disclose investigative techniques and/or procedures, thereby impairing their future effectiveness.

Exemption (b)(7)(F) authorizes the withholding of information compiled for law enforcement purposes [the disclosure of which] could reasonably be expected to endanger the life or physical safety of any individual.

You have the right to appeal this response within 90 days from the date of this letter. Should you decide to do this, yourappeal must state, in writing, the grounds for appeal, together with any statement or arguments. Such an appeal should be addressed and directed to the Solicitor of Labor, citing OIG/FOIA No.218061, Room N-2428, 200 Constitution Avenue, N.W., Washington, D.C. 20210. Please refer to the Department of Labor regulations at 29 CFR 70.22 for further details on your appeal rights.

Should you wish to discuss this response to your request, feel free to contact this office at FOIA.PrivacyAct@oig.dol.gov or the DOL FOIA Public Liaison, Thomas Hicks at 202-693-5427 Hicks.thomas@dol.gov Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769. Finally, as always, this office appreciates your patience in this matter. Fees were not assessed for this request. If you have any questions concerning this letter, feel free to contact this office at FOIA.PrivacyAct@oig.dol.gov or Pacheco.kimberly@oig.dol.gov Please refer to FOIA case 218061 on future correspondence.

Sincerely, *Kim Pacheco* Kimberly Pacheco DOL OIG FOIA Office of Information Disclosure

Enclosures: 283 pages



Number: 1-600

Date: May 5, 2000

1. PURPOSE

This Directive sets forth policy, assigns responsibilities and establishes procedures for the maintenance of a Records Management Program (RMP) within the Office of Inspector General (OIG).

2. SCOPE

This Directive applies to the Office of Inspector General Headquarters and Field Offices.

3. BACKGROUND

Executive branch officials, including Presidential appointees, create and receive federal records. The Federal Records Act (44 U.S.C., chapters 21,29,31,33) is the basis for the governments' policies and procedures for the creation, maintenance, and disposition of these records. The Act and related regulations define federal records, mandate their creation and preservation, establish government ownership of them and provide legal procedures for their disposition. The National Archives and Records Administration (NARA) operates a system of Federal Records Centers (FRC) for the economical storage of permanent records and services on non-current records for Federal agencies, pending their deposit in the National Archives of the United States or other disposition authorized by law. Reference should also be made to DLMS 1, Chapter 400, Records Operation Program.

4. **RESPONSIBILITY**

A. The **Inspector General** is responsible for:

(I) Developing and implementing an effective RMP within the OIG that is consistent with Department of Labor Records Management Program.

(2) Designating an individual to serve as the OIG Records Officer (OIGRO) and notifying the Departmental Records Officer (DRO) of the name, title, location, and telephone number of the designee, and of any subsequent changes in assignment to this position.

B. The **OIGRO**, located in the Office of Legal Services (OLS), is responsible for:

(1) Maintaining liaison with the DRO and the NARA on records operations activities.

(2) Performing managerial duties required for the installation and management of a records operations program to meet prescribed departmental and NARA standards.

(3) Reviewing requests for disposition of OIG records prior to their submission to the DRO for approval.

(4) Providing staff advice and assistance to OIG Program Managers having custody of records to establish and implement records schedules for all records. These schedules will be periodically updated and revised according to Agency needs.

(5) Establishing OIG procedures and providing technical assistance to Headquarters and Regional Offices on records operations activities.

(6) Establishing and maintaining, as required by the Federal Property Managers Regulations (FPMR), a vital records program to insure the uninterrupted operation of essential OIG functions during national emergency conditions.

(7) Training records liaison personnel in each major office component to operate the OIG Records Management Program.

C. Management Services Specialists (MSS) are responsible for:

(1) Serving as Records Liaison Officers (RLO) for their respective regional organization components.

(2) Providing guidance and assistance to their regional organization components to ensure that records are economically and efficiently transferred to Regional Federal Records Centers (RFRC) and/or to a departmental holding area.

(3) Providing assistance and advice to their regional organizations component on filing and micrographics equipment availability.

(4) Maintaining liaison with the regional NARA components on records maintenance and disposition activities.

5. POLICY

A viable Records Management Program is an integral part of the OIG's continuing effort to efficiently manage its records.

(a) All records of the OIG shall be identified on a "Request for Records Disposition Authority" (SF 115) that has been reviewed by the OIGRO, submitted to the DRO, and approved by NARA.

(b) No records may be destroyed, retired, or transferred unless such action is specified in the approved Disposition Schedule.

(c) All records shall be destroyed, retired, or transferred, prescribed in the Disposition Schedule, within 120 days of the scheduled time.

(d) Records to be generated through computer processing shall be incorporated in the Disposition Schedule at the time the processing system is approved by the OIG, and before they are actually produced.

(e) No records may be produced, destroyed or modified through the use of word processors, personal computers, computer terminals, or other types of distributed electronic equipment unless the records are included in a Disposition Schedule that specifies such action.

(f) All documents, forms, computer printouts, folders and file cabinets should be designed for, letter size ($8 \frac{1}{2} \times 11$). Use of legal size documents are strongly discouraged. All filing for records requires specific justification, along with data and approval by the DOL Records Officers.

6. **DEFINITIONS**

A. Records

All books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the information value of the data in them. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of processed documents are not included.

- 1. **Permanent Record.** Any record that has sufficient historical or other value as to warrant its continued preservation is a permanent record of the U.S. Government. Designation of records as "Permanent" is proposed by the DOL Agency responsible for their maintenance and approved as such through professional archival appraisal by NARA.
- 2. **Temporary Record.** Any document which does not warrant preservation by NARA as a permanent record is considered to be temporary, although it may be retained for a number of years after its period of value. A retention period in office and FRC must be specified and included on any records schedule submitted for departmental and NARA's approval.

B. Nonrecord

Any document preserved only for convenience of reference, papers of transitory value such as routine requests for information, letters of transmittal which may be discarded immediately after receipt or at the end of a brief suspense period, and records not needed for the conduct of future operations. Nonrecord materials also include stocks of publications and blank forms. The following types of material may be considered as nonrecord in character and discarded without further authorization.

1. Extra copies of papers preserved only for convenience of reference, such as reading files, and follow-up or suspense copies of correspondence. These may be destroyed after a very brief period.

- 2. Processed or published materials received from other activities or offices, internal or external, which require no action and need not be retained for documentary purposes. In this case, the originating office or activity must maintain the record copy of such materials.
- 3. Catalogs, trade journals, and other publications or papers received from other government agencies, commercial firms, or private institutions, which require no action and are not an integral part of any activity.
- 4. Correspondence and other temporary records of short term value which, after action has been completed, have neither evidential nor utilitarian value, such as communications concerning hotel reservations.
- 5. Working papers, preliminary drafts, and other similar materials summarized in final or other forms.
- 6. Reproduction materials such as stencils, hectograph master and offset plates.
- 7. Shorthand notes and stenotype tapes which have been transcribed.
- 8. Information copies of correspondence and papers on which documented administrative action is taken.
- 9. Vesicular or diazo copies on microfilm or microfiche.

C. Operating Record - Any document which contains operating details or which records purely routine transactions. Such records usually have no administrative value or do not contain information of potential interest to future research.

D. Vital Record - Denotes records essential for maintaining the continuity of Government activities during and after an emergency. (See NARA Records Management Handbook, Federal Archives and Records Centers, 1979, available through normal NARA channels (NSN-7610-00-298-6904.)

E. **Classified Record** - Any document of official information which, in accordance with provisions of Executive Order 11562 of March 8, 1972, as amended, requires safeguarding in the interest of national defense and has been classified as <u>Top Secret</u>, <u>Secret</u> or <u>Confidential</u>.

DLMS-2, Chapter 300, governs the classification and-handling of all classified records in the DOL.

F. Subject-Numeric Files - An organizational filing system to categorize records according to subject content. The files are divided into primary subject divisions, with secondary and lower subdivisions of each primary subject arranged under the primary subject. Primary subjects are arranged alphabetically with recognizable letter abbreviations, while subdivision subjects (secondary, tertiary, quaternary, etc.) are assigned numbers under the primary subject and arranged numerically.

G. Case Files - A series of documents about a person, group, organizations, place or event. As a rule, volume and use dictate the case file arrangement. Case files are not usually an integral apart of subject-numeric files. Examples include official personnel folders, compliance, enforcement, contract, and litigation files.

H. Working Files - A collection of drafts, transaction, tapes, extra copies of correspondence, and other preliminary materials related to a particular project. Although working file materials record certain activities and are included in the definition of records, their documentary value decreases after they have served their original purpose. If records of this type are to be maintained in the official files for documentation purposes, they must be removed from the working files and placed in the official files.

I. Record Schedule - A written description of the records created or accumulated by a DOL Agency. A records schedule establishes formal and legal instructions for the retention and disposal of records, and identifies permanent records for eventual transfer to NARA for preservation.

J. Records Management - means the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, records maintenance and use, and records disposition;

K. Records Creation - The production or reproduction of any record;

- L. Records Maintenance and Use Any activity involving:
 - 1. location of records of a Federal agency;
 - 2. storage, retrieval, and handling of records kept at office file location by or for a Federal agency;

- 3. processing of mail by a Federal agency; or
- 4. selection and utilization of equipment and supplies associated with record and copying.
- **M. Records Disposition** Any activity with respect to:
 - 1. disposal of temporary records no longer necessary for the conduct of business by destruction or donation;
 - 2. transfer of records to Federal agency storage facilities or records centers;
 - 3. transfer to the National Archives of the United States of records determined to have sufficient historical or other value to warrant continued preservation; or
 - 4. transfer of records from one Federal agency to any other Federal agency.

N. Records Center - An establishment maintained and operated by the Administrator or by another Federal agency primarily for the storage, servicing, security, and processing of records which need to be preserved for varying periods of time and need not be retained in office equipment or space.

0. Records Management Study - An investigation and analysis of any Federal agency records, or records management practices or programs (whether manual or automated), with a view toward rendering findings and recommendations with respect thereto.

P. Inspection - Reviewing any Federal agency's records or records management practices or programs with respect to effectiveness and compliance with records management laws and making necessary recommendations for correction or improvement of records management.

Q. Servicing - making available for use information in records and other materials in the custody of the Administrator, or in a records center:

- 1. by furnishing the records or other materials, or information from them, or copies or reproductions thereof, to any Federal agency for official use, or to the public; or
- 2. by making and furnishing authenticated or unauthenticated copies or reproductions of the records or other materials.

R. Unauthenticated Copies - Exact copies or reproductions of records or other materials that are not certified as such under seal and that need not be legally accepted as evidence.

S. National Archives of the United States - Those official records which have been determined by the Archivist of the United States to have sufficient historical or other value to warrant their continued preservation by the Federal Government, and which have been accepted by the Administrator for deposit in his custody.

T. Historical Materials - Books, correspondence, documents, papers, pamphlets, works of art, models, pictures, photographs, plats, maps, films, motion pictures, sound recordings, and other objects or materials having historical or commemorative value.

7. PROCEDURES

The procedures and guidelines following are consistent with departmental policies for maintaining OIG records. These procedures and guidelines prescribe the minimum requirements for OIG records maintenance. The disposition of Federal records must be authorized. Under provisions of the law, agency records may be destroyed only with the approval of the Archivist of the United States or in accordance with GRS. OIG officials, unless expressly authorized by the NARA to do so, may not remove or destroy Federal Records from the agency.

The GRS provide mandatory disposition instructions for records common to all agencies. (See OIGRO for a copy of the disposition schedule) The GRSs 1,2,7,10,11,12,14,16 and 18 deal with files established within the OIG as well as other federal agencies. GRS 14, items 16-25 deal specifically with Freedom of Information Act (FOIA) and Privacy Act files.

The NARA has approved Offices of Inspector General records schedules for the Semiannual Reports, N9-174-99-03 (<u>Attachment A</u>); Office of Audit, N1-174-99-1 (<u>Attachment B</u>); Office of Communications, Inspections and Evaluations, N1-174-00-2 (<u>Attachment C</u>); Office of Investigations, N1-174-00-1 (<u>Attachment D</u>) and the Division of Labor Racketeering files, N9-174-99-02 (<u>Attachment E</u>).

Revised or new OIG Records Schedules are to be prepared by the disposing offices. Proposed records schedules are to be filled out on SF 115, "Request for Records Disposition Authority" (See the OIGRO for forms). A comprehensive schedule can be attached to an SF 115. The OIGRO will review the proposed records schedules before forwarding them to the DRO for review.

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The DRO forwards acceptable proposed records schedules to NARA for approval.

NARA approved records schedules are returned by the DRO to the OIGRO who is responsible for ensuring that approved records schedules are distributed to OIG personnel involved in the maintenance and disposition of the itemized records. Quarterly records schedules will be prepared and kept on file in the OIGRO's office.

OIGRO shall review semiannually all approved OIG records schedules to ensure that inappropriate descriptions or disposition periods are corrected and that new series of records are included in the updated Records Schedule and forwarded to the DRO on SF 115.

Records Disposition.

The following procedures shall be used for retiring records to a FRC in accordance with the Records Schedule. These procedures also apply to records donated for preservation and transferring to another Federal agency.

Inactive records are transferred to the nearest FRC at the end of the prescribed period as indicated on an approved records schedule. The records are stored at FRC until the retention period has expired.

Records Transfer.

The following procedures are required for records transfer:

(a) Prepare an SF 135 and 135A, Records Transmittal and Receipt for each transfer. Completed form must be sent to the Washington National Records Center (WNRC) for approval prior to shipping records. These documents are used for control purposes. Type an original and three copies of the SF 135 and SF 135A (Forms SF135 and 135A can be obtained from the ARO). See the back of the sample SF 135 for instructions.

(b) Complete all blocks on the SF 135 135A except item four and the items 6(j-m), to be "Completed By Records Center." Sign and date item 2. Do not use a rubber stamp. In item 3 show the name and telephone number of the person to contact concerning the records. Agency offices outside the local calling area should give their FTS number. Show your complete mailing address in item 5.

(c) For Items 6(a-c), the OIGRO maintains a log and assigns the accession number. Exceptions to this is for regional and field records.

(d) For Item 6(d), a standard size box equals 1 cubic foot half-size boxes equal 1/2 cubic foot each.

(e) In Item 6(f), Series Description, describe the records in sufficient detail to allow WNRC personnel to verify compliance with your records control schedule. Show inclusive dates. State "GAO Site Audit" if the records have been so designated by the General Accounting Office (GAO).

(f) Item 6(f) should include a detailed box-by-box listing if the records are scheduled for permanent retention. Otherwise, describe the records and retain the detailed listing in your office so that you may provide agency box numbers when requesting reference service.

(g) Complete Item 6(g), restriction, using one of the codes listed on the back of the SF 135. Explain any special restrictions at the bottom of the page, if necessary.

(h) Complete Item 6(h), by citing the records control schedule title or alpha-numeric designation and the series item designation for each accession. Use the GRS (36 CFR 1228.22) when dealing with records common to most agencies - contracts, bills of lading, and similar records. Contact the OIGRO for additional information.

(i) Compute the disposition date (item 6[i]) using instructions in your records control schedule. Since disposition is accomplished in quarterly cycles, you may advance the date to the beginning of the next calendar quarter (for example, 1/87, 4/87, 7/87, 10/87) to obtain the actual date of disposition.

(j) Forward an original and three copies of your completed SF 135 to OIGRO. Hold one copy for your suspense file. OIGRO will review your SF 135 for completeness and accuracy. If acceptable, OIGRO will forward to the WNRC. The WNRC will, within ten days after receipt forward an approved copy of your SF 135 for authorizing shipment of the boxes.

(k) The WNRC will return a copy to you, annotated with a location, as a receipt after the records have been shelved.

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Records being transferred must be placed in FRC containers, or other boxes approved by NARA for shipment of records. FRC containers are available through DOL supply channels:

Required material for records transfer and reference .

Standard-size record boxes:

14-3/4" x 12"x 9-1/2" NSN 8115-00-117-8249 14-3/4" x 12"x 9-1/2" NSN 8115-00-117-8344 15" x 12" x 10" NSN 8115-00-290-3379

Special purpose boxes:

<u>Half-size box</u> 14-3/4" x 9-1/2" x 4-7/8" NSN 8115-00-117-8338

<u>Magnetic tape box</u> 14-3/4" x 11-3/4" x 11-3/4" NSN 8115-00-117-8347

Remove all nonrecord material and extra copies of records from official files.

Records must be separated into series. A series is defined as a "block of records having the same disposition authority and same disposition date." Each item or subordinate item in-your records control schedule represents a series. Identify and separate your records into blocks (series) by item number and cut-off date.

Each series must be transferred as a separate accession. Mixed series cannot be accepted without an approved exception. Each accession must consist of at least one box.

Use the proper size box when packing records. For legal and letter-size material, use standard-size boxes. Use half-size or other boxes only for microfilm, index cards, or other odd-size material.

To assemble the standard-size box, fold the two 12 inch flaps inside, then fold the two 15 inch flaps prior to taping. Place letter-size records in the box with tabs facing the numbered end. The numbered end will be opposite the stapled end. Place legal-size records in the box so that the tabs face to the left of the box as you face the numbered end. Leave approximately 1 inch of space in each box for working the files--more if interfiles will be added later. Send only completed or closed case files, contracts, etc. This prevents separation of file papers and reduces the amount of vacant space in boxes. Leave all guides and tabs in the records if they will help WNRC personnel service the records.

Do not over pack your boxes. Never add additional material on the bottom, side or top of the records in the box.

After receiving the approved SF 135 from the WNRC, write the accession number in the upper left corner of each box in the accession. Write the agency box number in the upper right corner. Begin with box number 1 and include the total number in the accession, such as 1 of 10, 2 of 10, etc. Do not use labels to supply additional identifying information. No standard method of affixing labels is effective in long-term center storage. Accession number and box number must be written directly onto the box with a felt-tip marker provide any additional identifying information in the same manner.

Shipment of Records

The OIGRO will arrange for the shipment of the records. The records must be shipped within 90 days after receipt of the approved SF 135. If the transfer cannot be made within this period, promptly advise the OIGRO. Unexplained delays of more than 90 days will result in WNRC cancelling the accession number and returning the original SF 135. The Office will then be required to resubmit the accessioning paperwork, obtain approval for the shipment and renumber its containers with a new accession number.

Within the Washington, D.C. area the WNRC can use its trucks to pick up most shipments of 24 boxes or more and deliver them to the center. To arrange for possible pickup service by the WNRC, call the OIGRO.

An agency shipping boxes to the WNRC should load them in reverse numerical sequence so that the first box to be unloaded at the Center will be number 1 and others will follow in numerical order. Do not tape over the accession number or the agency box numbers. The Center does not accept shipments which are improperly marked, taped, packed, or out of numerical order.

Use a separate Optional Form 11 (OF 11) for each folder or box requested. Two or more contiguous file items, folders, or cartons, however, may be treated as one item and requested on one OF 11.

If records are being requested under the provisions of the Freedom of Information Act or the Privacy Act, make a notation to that effect in the "Remarks" section of the OF 11 to ensure priority handling and immediate return.

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Requesting Reference Service.

OF 11, "Reference Request - Federal Records Center, is used to recall records from the WNRC. Each request is completed within 24 hours. Use the telephone only in rare cases of genuine emergency. In these cases, call between 9:00 a.m. and 3:30 p.m. and arrange for pickup when making the request.

When completing the OF 11, agencies should always furnish the accession number, agency box number, the WNRC location number, and the nature of the service.

Relocation of Records.

Occasionally, it becomes necessary to move records within the WNRC. When this happens, agencies will be notified of the relocation. NA Form 13016, Notice of Accession Location Change is mailed the month following the relocation. It is imperative that agency copies of SF 1355 be annotated to show new location numbers for use in securing reference service.

Records Disposal.

Agencies are notified of the pending disposal of records. NA Form 13001, Notice of Intent to Destroy Records, is mailed 90 days prior to scheduled destruction. If there is no objection from the agency during that period, the records will be destroyed as scheduled.

Justification for continued retention must be submitted in writing indicating the specific need (audit, legal or other pertinent issues) and the estimated duration of continued retention of the records.

Standard Form 258, Request to Transfer, Approval, and Receipt of Records to National Archives of the United States, is prepared for the transfer of records to the legal custody of the National Archives. SF 258 is used to document this change in ownership of the records and to state terms of the transfer. A copy of the SF 258 is forwarded to the agency for signature when permanent records are scheduled for transfer.

Records Donated for Preservation and Use.

Records whose disposal date has been reached may be transferred to another government organization or to a private institution, corporation, or person applying for them when such transfer is in the public interest and provided that:

(a) The records have been appraised by NARA as disposable.

(b) The applicant agrees not to sell the material as records or documents.

(c) The transfer is made without cost to the United States Government.

(d) Disclosure is not prohibited by law.

Transfer to other Federal Agencies.

Transfer of departmental records to other Federal agencies is authorized if:

(a) The records are transferred to FRC or NARA.

(b) They are loaned for official use

(c) The transfer is required by or pursuant to statue, Executive Order, or a Presidential reorganization plan.

Transfer of Permanent Records to the National Archives.

Permanent Agency records are inventoried and scheduled by the Departmental or OIGRO, as appropriate, and appraised by a NARA archivist. NARA furnishes an accession inventory to the Departmental Records Officer who forwards it to the appropriate agency. This inventory constitutes an agreement on the subject content of the records, any restrictions on their use, condition, and volume of the records.

Direct transfer of records to NARA initiated by the Departmental or OIGRO who specifies the nature and quantity of records proposed for transfer, identifies records and describe them on an SF 258, "Request to Transfer Approval and Receipt of Records." The completed SF 258 is forwarded to the Departmental Records Officer for review, who then forwards it to NARA. NARA inspects and appraises the records for archival value before

they are accepted or rejected. The direct transfer copy of machinereadable records occurs when the SF 258 is returned by NARA to the DRO.

Transfer of records from a FRC to NARA will be made at the end of the normal retention period specified on the applicable records schedule. At that time, NARA screens the records, completes the SF 258 and arranges the transfer of the records from FRC to National Archives of the United States.

When an Assistant Secretary or other executive appointee leaves the employment of the Department, the Agency Records Officer is responsible for assuring the transfer of the records to NARA. The authority for accession is contained in the Records Retention Plan of the Office of the Secretary or approved Agency records schedules. An original and two copies of a completed SF 258 are forwarded to the Departmental Records Officer for review prior to forwarding the records to NARA.

All microfilm and microfiche records are eligible for retirement to a FRC. The procedures for the acquisition of filing equipment and disposition for this media are the same as for paper records (i.e., preparation of SF 115, SF 135 and SF 258).

9. EFFECTIVE DATES AND CANCELLATION

This directive rescinds IGD 1-600-1, OIG Records Management Program, dated 6/89.

This Directive is effective immediately and will remain in effect until canceled or superseded. It requires implementation of action items, and contains information of a continuing nature.

OIG SEMIANNUAL REPORT TO CONGRESS N9-174-99-3

A. Recordkeeping Copy (paper)

Permanent (N1-174-96-2)

B. Electronic Copies

Created on electronic mail and word processing systems and used for creation, dissemination, revision, or updating of recordkeeping copy:

Destroy/delete when recordkeeping copy has been created and when no longer needed for dissemination, revision or updating.

OIG AUDIT FILES N1-174-99-1

Case files for program audits that assist management in identifying, analyzing and resolving program and organizational performance/financial policy issues, studies of areas of specific concern, and internally generated study initiatives designed to achieve organizational improvement. During the course of an audit, work papers (which can include survey questionnaires, rough draft proposals and correspondence) are used to prepare the final recommendations and report. The audit staff prepares a final report which is incorporated into the work papers on completion of each audit.

A. Audit Files

1. <u>Case Files Of Internal Audits Of Agency Programs, Grantees</u> <u>And Contractors</u>

Case files contain the record copy of final reports and other records generated in the course of conducting the audit, including work papers.

Cut off at the end of FY in which case is closed.

Destroy 3 years after cut off

2. Electronic Mail And Word Processing Records

Electronic copies of records that are created on electronic mail and word processing systems and used solely to generate a recordkeeping copy of records. Also includes copies of records created by electronic mail and word processing systems that are maintained for dissemination, revision, or updating. (1) Copies of records covered by sub-item a. that have no further administrative value after the recordkeeping copy is made. Includes copies maintained by individuals in personal files, personal electronic mail directories, or other personal directories on hard disk or network drives, and copies on shared network drives that are used only to produce the recordkeeping copy.

Destroy/delete within 180 days after recordkeeping copy has been produced.

(2) Copies used for dissemination, revision, or updating that are maintained in addition to the recordkeeping copy.

Destroy/delete when dissemination, revision, or updating is completed.

B. Audit Information Reporting System (AIRS)

The Audit Information Reporting System is designed to index and track audit files. It is currently comprised of the following subsystems: (1) Audit Management and Planning System (AMPS) that tracks the due date and time spent on various audit activities; (2) Time Management System (TMS) that documents the time spent on each audit activity by staff-completed time sheets; (3) Audit Resolution and Closure Tracking System (ARCTS) that tracks agency actions to resolve and close audit recommendations; and, Contract Funds Tracking System (CFTS) that tracks time and funds spent by independent public accounting firms on Office of Audit activities. The subsystems are designed to provide the information to the Office of Audit to develop performance measures and determine the cost for each audit activity. Information is extracted from the audit files and provides the capabilities for managing and tracking audits, indexing audit information, gathering and consolidating work hours and managing employee training information. Input forms are filed with the workpapers of a specific case/project after required information has been entered into the appropriate subsystem. Summary reports are generated as needed for management and planning purposes.

1. Inputs

Destroy/delete 3 years after related case is closed.

2. <u>Outputs</u>

a. Hard copy of records related to a specific case/project.

File in appropriate case/project file.

Destroy 3 years after related case is closed.

b. Hard copy of periodic reports generated about the status of cases.

Destroy when superseded or obsolete.

3. Data on Electronic Media

Destroy/delete when related case is destroyed.

4. <u>Systems Documentation</u>

Destroy/delete when dissemination, revision, or updating is completed or when information is superseded or obsolete.

OIG Analysis, Complaint and Evaluation (ACE)

Files N1-174-00-2

Program evaluations, analysis, studies, reviews and special projects that assist DOL and OIG management in identifying, analyzing, and resolving program, organizational, and policy issues or designed to achieve organizational improvements.

A. Formal evaluations, analysis, studies, and special projects files.

Includes survey questionnaires, comments from outside sources, notes, draft proposals, correspondence, electronic data from outside sources, and copy of final report.

1. <u>Textual Records</u>

Temporary.

Cut off at the end of the fiscal year in which file is closed. Transfer to offsite storage area.

Destroy 5 years after cutoff.

2. <u>Electronic Records</u>

Temporary.

Transfer to storage media at the end of the fiscal year in which file is closed.

Delete 5 years after closure.

B. All other evaluations, inspections and special initiatives under review that do no result in the establishment of a formal case file.

Temporary.

Cut off at the end of the fiscal year in which file is closed.

Transfer to offsite storage.

Destroy 5 years after cutoff.

C. Correspondence and notations of telephone calls containing anonymous or vague allegations of fraud, waste and abuse that do not result in an evaluation, audit or investigation, do not warrant further review, are referred to program offices or other agencies, or are not covered by items 1 and 2 of this schedule.

Temporary.

Cut off at the end of the fiscal year in which file is closed.

Transfer to off site storage. Destroy 5 years after cutoff.

D. Telephone log sheets of allegations of fraud, waste, and abuse received over the DOL OIG Fraud, Waste and Abuse Hotline.

Temporary.

Cut off at end of fiscal year.

Destroy 3 months after cut off.

E. Electronic Mail And Word Processing Records

Created on electronic mail and word processing systems and used solely to generate a record keeping copy of the records covered by this schedule. Also includes electronic copies of records created on electronic mail and word processing systems that are maintained for updating, revision, or dissemination.

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a. Copies of records covered by items 1, 2, and 3 that have no further administrative value after the record keeping copy is made. Includes copies maintained by individuals in personal files, personal electronic mail directories, or other personal directories on hard disk or network drive, and copies of shared network drives that are used only to produce the record keeping copy.

Destroy/delete within 180 days after the record keeping copy has been produced.

b. Copies used for dissemination, revision, or updating that are maintained in addition to the record keeping copy.

Destroy/delete when dissemination, revision, or updating is completed, or no longer needed.

F. Analysis, Complaints, and Evaluations (ACE) Tracking System.

- 1. <u>Inputs</u> Case numbers, hours involved, employee assignments and other information necessary for tracking evaluations, analysis, studies, reviews and special projects. Information is taken from project files covered by items 1 and 2 above.
- 2. <u>Electronic Data</u>

Temporary.

Delete when no longer needed.

3. <u>Outputs</u> - Summary reports used for trend analysis. May be in either textual or electronic format.

Temporary.

Delete/Destroy when no longer needed.

4. <u>Documentation needed to access and use ACE Tracking</u> <u>System</u>

Temporary.

Destroy/delete when updated or no longer needed, whichever is sooner.

OIG Investigative Case Files

N1-174-00-1

Files established to investigate allegations of fraud, abuse, and violations of laws and regulations. Cases relate to agency personnel, programs, and operations administered or financed by the agency, including contractors and others having a relationship with the agency.

A. Investigative case files.

Include correspondence, forms, reports, notes, transcripts of interviews, electronic data from outside sources, and final investigative report.

1. <u>Significant Case Files</u> - Involve agency personal at the Program Director or above level; result in intense media coverage; result in further investigation by Congress; or involve substantial amounts of money, excluding Labor Racketeering Investigations which are covered by Job No. N1-174-93-1.

Permanent.

Cut off files at the end of the fiscal year in which file is closed.

Transfer closed files to off site storage area.

Transfer to National Archives 10 years after cutoff.

Volume on hand: 0

Annual accumulation: <1 cubic foot

2. <u>All Other Case Files</u>

Temporary.

Cut off at the end of the fiscal year in which file is closed.

Transfer to offsite storage area.

Destroy 10 years after cutoff.

3. <u>Electronic Records Received From Outside Sources</u>

Temporary.

Transfer to storage media at the end of the fiscal year in which file is closed.

Delete 10 years after closure.

4. <u>Electronic Mail And Word Processing Records</u> - Created on electronic mail and word processing systems and used solely to generate a record keeping copy. Also includes electronic copies of records created on electronic mail and word processing systems that are maintained for updating, revision, or dissemination.

Copies that have no further administrative value after the record keeping copy is made. Includes copies maintained by individuals in personal files, personal electronic mail directories or other personal directories on hard disk or network drive, and copies on shared network drives that are used only to produce the record keeping copy.

Destroy/delete within 180 days after the record keeping copy has been produced.

Copies used for dissemination, revision, or updating that are maintained in addition to the record keeping copy.

Destroy/delete when dissemination, revision, or updating is completed, or no longer needed.

B. Investigation Intelligence System (IIS).

Data containing uncorroborated information of alleged criminal activity by individuals or organizations, excluding electronic files which are not directly related to current Labor Racketeering or Program Fraud criminal cases.

1. <u>Inputs</u> - Transcripts of interviews, information downloaded from Internet sources, complaint letters and memorandums, notations from hotline telephone calls, and other similar information in textual formats. This information is keyed into the system verbatim.

Temporary.

Destroy 2 years after entry or when no longer needed, whichever is longer.

2. <u>Electronic Data</u> - Information not confirmed 2 years after initial input.

Temporary.

Delete.

3. Information Confirmed But Not Associated With Case Or Established Criminal Organization

Temporary.

Delete 5 years after initial input.

4. Information Connected To Long Term, Known Organized Crime Activity

Temporary.

Review 10 years after initial entry.

Delete 10 years after initial entry if no longer needed.

5. <u>Outputs</u> - Various reports containing information on the number of cases of specific violations, time involved in investigation, number of sources, etc.

Temporary.

Destroy 1 year after printout or when no longer needed, whichever is sooner.

6. Documentation Needed To Administer The IIS

Temporary.

Destroy/delete when updated or no longer needed, whichever is sooner.

C. Investigative Case Tracking System.

- 1. <u>Inputs</u> Case numbers, hours involved, employee assignments and other information necessary for tracking case load, indexing case information, and managing agent work hours. Information is taken from files covered by item 1 above.
- 2. <u>Electronic Date</u>

Temporary.

Delete when no longer needed.

3. <u>Outputs</u> Summary reports used for analysis. May be in either textual or electronic format.

Temporary.

Delete/Destroy when no longer needed.

4. <u>Documentation needed to accesses and use Investigative Case</u> <u>Tracking System</u>

Temporary.

Destroy/delete when updated or no longer needed, whichever is sooner.

LABOR RACKETEERING INVESTIGATION CASE FILES

N9-174-99-02

A. Significant case files:

Case files on high level union officials or ranking members, case files that result in national media attention, and Congressional investigations. The Division of Labor Racketeering will identify these cases at close of case and tag them as significant case files that are area designated for preservation.

1. <u>Record Keeping Copy (Paper)</u>

Permanent (N1-174-93-1/1A)

2. <u>Electronic Copies</u> - Created on electronic mail and word processing systems.

Delete after Record keeping copy has been produced.

B. All other case files

1. <u>Recordkeeping Copy (Paper)</u>

Temporary (N1-174-93-1/1B)

2. <u>Electronic Copies Created On Electronic Mail And Word</u> <u>Processing Systems</u>

Delete after recordkeeping copy has been produced.

SF 115, Request for Records Disposition Authority

		LEAVE BLANK (NARA use only)					
REQUEST FOR RECORDS DISPOSITION AUTHORITY			JOB NUMBER				
To: NATIONAL ARCHIVES & RECORDS ADMINISTRATION 8601 ADELPHI ROAD, COLLEGE PARK, MD 20740-6001			Date Received				
1. FROM (Agency or establishment)			NOTIFICATION TO AGENCY				
			In accordance with the provisions of 44 U.S.C 3303a, the disposition request, including amendments is approved except for items that may be marked "disposition not approved" or "withdrawn" in column 10.				
2. MAJOR SUB DIVISION							
3. MINOR SUBDIVISION							
4. NAME OF PE	RSON WITH WHOM TO CONFER	5. TELEPHONE	DATE	ATE ARCHIVIST C		OF THE UNITED STATES	
I hereby records p needed a	CY CERTIFICATION certify that I am authorized to act for this a roposed for disposal on the attached fter the retention periods specified; and tha is of Title 8 of the GAO Manual for Guidar	_page(s) are not needed now it written concurrence from the nce of Federal Agencies,	for the b	usiness Il Accou	of this agency inting Office,	or will not be under the	
	is not required	is attached; or	has been requested.			sted.	
DATE	SIGNATURE OF AGENCY REPRES	SENTATIVE		TITLE	E		
7. ITEM NO.	ITEM NO. 8. DESCRIPTION OF ITEM AND PROPOSED D		9. GRS OR SUPERSEDED JOB CITATION		DED JOB	10. ACTION TAKEN (NARA USE ONLY)	
	See attached sheets						

115-109

PREVIOUS EDITION NOT USABLE

STANDARD FORM 115 (REV. 3-91) PRESCRIBED BY NARA 36 CFR 1228

Instructions for Standard Form (SF) 115

OIG Manual

U.S. Department of Labor Office of Inspector General



Transmittal Sheet

Date: SEP 2 8 2007

IGD 2-1100

ADMINISTRATION: Continuity of Operations Plan (COOP)

This Inspector General Directive (IGD) contains the OIG's Continuity of Operations Plan (COOP) which outlines OIG's plans to continue performance of essential functions, deemed essential, with minimal or no interruption during national security emergencies, or other emergencies that could threaten DOL personnel, infrastructure, information systems or other vital assets.

This directive rescinds previous version of the OIG COOP.

This Directive is effective immediately and will remain in effect until canceled or superseded. It requires implementation of action items, and contains information of a continuing nature.

GORDON S. HEDDELI

Inspector General

INSTRUCTIONS: Insert this IGD in Part 2, Administration, of the OIG Manual.

U.S. DEPARTMENT OF LABOR OFFICE OF INSPECTOR GENERAL



CONTINUITY OF OPERATIONS PLAN (COOP)

SEPTEMBER 28, 2007

SECURITY NOTICE

Information contained in this document is designated FOR OFFICIAL USE ONLY and is protected by the Privacy Act and shall not be disclosed, in part or in its entirety, without authorization. Unauthorized use of this information may constitute an invasion of privacy and result in disciplinary actions.

SECURITY NOTICE

The United States (U.S.) Department of Labor (DOL), Office of Inspector General (OIG) Continuity of Operations (COOP) Plan is designated FOR OFFICIAL USE ONLY (FOUO) and shall not be disclosed, in part or in its entirety, without authorization. It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552) but in all cases, it is to be controlled, stored, handled, transmitted, distributed, and disposed of per Government policy relating to FOUO information.

Distribution of the DOL-OIG COOP Plan, in part or in its entirety is limited to those individuals with an official need to know. The DOL and OIG COOP Plans contains private and/or privileged information and should not be distributed to personnel who do not have valid "need-to-know;" posted on public web servers; disseminated over unprotected Internet servers; or released to the media or the general public. The disclosure of information in the COOP Plan could compromise the security of DOL staff, contract personnel, essential equipment, services, and Federal Government systems; and may also jeopardize the privacy of DOL personnel. Any decision to release or withhold information contained in this COOP plan should be coordinated first with the Inspector General and subsequently with the Director of the Emergency Management Center (DEMC) or approved designee.

i

Foreword

The U.S. DOL is responsible for administering a variety of Federal labor laws fostering and promoting the welfare of the job seekers, wage earners, and retirees of the United States by improving their working conditions, advancing their opportunities for profitable employment, protecting their unemployment insurance, retirement and health care benefits, helping employers find workers, strengthening free collective bargaining, and tracking changes in employment, prices, and other national economic measurements. The Office of Inspector General has the statutory obligation to monitor and provide oversight of these functions to prevent fraud, waste and abuse while increasing efficiencies.

It is imperative that DOL maintains the capability to continue performance of these functions, deemed essential, with minimal or no interruption during national security emergencies, or other emergencies that could threaten DOL personnel, infrastructure, information systems or other vital assets.

The Office of Inspector General (OIG) COOP Plan will be used to provide broad guidance and supplement existing emergency preparedness capabilities and programs. It is designed to ensure all functions necessary to sustain the OIG and DOL missions can be continued during disruptions that affect the habitability of the agency headquarters and/or critical infrastructures.

It is therefore essential that all employees are made aware of the OIG and DOL COOP Plans and understand their role in the plan's overall success.

Recommended changes to this document should be sent to:

(b) (6)

COOP Coordinators U.S. Department of Labor Office of Inspector General 200 Constitution Avenue, NW Suite S-5506 Washington, D.C. 20210 (202) 693-5100

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Appendix V – Pandemic Influenza Plan (DOL General)

Appendix W – COOP-COG Integration Plan (DOL General)

Appendix X - COOP-COGCON Matrix (DOL General)

1.0 INTRODUCTION

1.0 PURPOSE

The purpose of the Office of Inspector General (OIG) Continuity of Operations Plan (COOP) will supplement the Department of Labor's (DOL) COOP plan, developed and managed by the Office of the Assistant Secretary for Administration and Management's (OASAM) Emergency Management Center (EMC). This COOP plan is to provide policy, procedures and processes to ensure the continuous performance of essential OIG functions in the event of:

- natural or manmade disasters, and/or
- terrorist acts.

The COOP plan, in addition to supplementing the Department's plan, will make use of supporting plans to protect critical services and infrastructure both at the National Headquarters and Regional operating sites. Other related documents to these plans are:

- DOL Shelter in Place Plan,
- DOL Pandemic Influenza Plan, and
- OIG Information Technology Contingency Plans.

While all potential contingencies cannot be anticipated, the OIG plan will serve as a guide to all managers and employees nation-wide for major contingencies. Variations will be made to account for differences within the operating regional and sub-regional offices as well as identified regional or specific risk factors. It is incumbent upon each manger and employee to become familiar with this plan and to have the appropriate level of knowledge to support continued operations and mitigate personal risk during any contingency.

This plan is a living document and as such is subject to constant updates based upon new guidance, intelligence and revised risk assessments.

1

1.1 BACKGROUND

The DOL's COOP Plan is one component of an overall federal response plan that ensures that the federal government, as a whole, is able to continue functioning under any circumstance. Each federal bureau and department maintains a COOP Plan, the collection and integration of which ensures the Continuity of Government (COG).

The Federal Emergency Management Agency (FEMA) issued Federal Preparedness Circular 65 on June 15, 2004. This Circular provides guidance to Federal Executive Branch departments and agencies for use in developing COOP Plans. This unclassified guidance provides sufficient depth to ensure appropriate planning for critical operations, alternate facilities, and resumption. Additional Information is available in the DOL COOP Plan - Appendix C.

1.2 Scope

This COOP plan facilitates the execution of OIG essential functions from an alternate location(s) when Agency facilities are rendered uninhabitable during an emergency situation.

This COOP Plan can be implemented with or without warning -- and either during or after office hours. It provides guidance from the onset of the incident through recovery and reconstitution and a return to normal agency operations.

The OIG will continue to provide protective services for the Secretary of Labor and other designated Departmental senior executives as mandated. The increased law enforcement authority granted by the Homeland Security Act presents unique capabilities to support Federal and local law enforcement authorities, external to the Department of Labor, which may become necessary during actual contingencies or extenuating circumstances.

This plan applies to the essential functions that must be performed in or by the OIG regardless of operating conditions as they apply to Audit and Investigative functions. This plan does not address smallscale events that may disrupt normal business activities, such as loss of information technology capabilities (i.e., E-mail and local area network services) that result in temporary inconveniences.

1.4 Objectives

The objectives of this plan are as follows:

- 1. Facilitate the performance of essential functions during an emergency and provide a mechanism to identify, verify or mitigate potential risks to the OIG's operational and functional integrity;
- Identify key leaders and supporting staff critical to performance of essential functions and ensure that they receive regular training;
- 3. Ensure relocation facilities and alternate relocation facilities support minimum essential operations;
- 4. Achieve a timely and orderly recovery from an emergency for the resumption of full service;
- 5. Provide a process by which employees are notified and alternate work sites are established based upon the specific categories of contingency; and
- 6. Ensure each OIG employee understands the processes, his/her responsibilities and/or required actions during an actual contingency.

1.5 Plan Organization

- 1. Introduction Provides an overview of continuity of operations planning.
- 2. **Elements of a Viable Plan**—Outlines the critical components necessary to maintain a successful, efficient agency capability during emergencies.
- 3. **Concept of Operations**—Provides the operational framework for implementation. Team structures, leadership, and operational elements associated with continuing the essential functions are explained. This portion addresses necessary companion documentation and standard operating procedures and the relationship with other emergency plans. It also addresses building specific, National Capital Region, City-wide and

catastrophic scenarios.

- Plan Implementation—Provides the lifecycle of events from plan activation to reconstitution of normal activities. It defines those staff positions that have authority and responsibility to activate and execute the plan.
- 5. **Tests, Training, and Exercise Program**—Describes the activities used to educate agency personnel to use the plan.
- 6. **Plan Maintenance**—Articulates the agency's standards for updating and maintaining the COOP program.

The appendices provide additional information in support of COOP operations. Most of the appendices provide operational details for use upon activation.

2.0 ELEMENTS OF A COOP PLAN

A viable COOP plan, as defined in Federal Preparedness Circular (FPC) 65, addresses these elements:

- 2.1 Essential Functions
- 2.2 Emergency Relocation Group
- 2.3 Vital Records and Critical Systems
- 2.4 Interoperable Communications
- 2.5 Orders of Succession
- 2.6 Delegations of Authority
- 2.7 Relocation Facility(ies)
- 2.8 Support by Teleworking Employees
- 2.9 Drive Away Kits
- 2.10 Emergency Medical Information

The following section provides an outline of each plan element.

5



2.1 Essential Functions

The OIG has identified four essential functions that must continue during an emergency.

Table 2-1: Responsible Office, Response Time, And Essential Functions			
Responsible Office	Time Response Severity*	Description of Essential Function	
OLRFI & OISI	(b) (7)(E), (b) (7)(F	Provide Security to DOL Leadership The Protection detail will continue to provide the security for the Secretary. If necessary protection will be extended to other senior management officials designated by the Secretary within available resources. Limited augmentation may be possible through the Office of Inspections and Special Investigations and the Washington and Philadelphia Regional Offices.	
OLRFI, OISI & OLS		Provide Law Enforcement Assistance OIG criminal investigators will assist other law enforcement agencies by virtue of their statutory Law Enforcement Authority; together with special Deputation authority by the Department of Justice or other jurisdictions for which support has been requested.	
OLRFI, OISI & OLS		Conduct Criminal Investigations Conduct investigations pursuant to the IG Act and other legal authority.	
OA & OMAP		Provide Audit, Administrative, and Technical Assistance Provide audit, administrative, and technical assistance and advice to the Department of Labor and Congress in the restoration of services and functions.	

As COOP operations continue, each office should evaluate its responsibilities and activate non-essential functions, as appropriate.

2.2 Emergency Relocation Group

OIG's "Emergency Relocation Groups" (ERG), listed on Exhibit A, <u>Table A-2, Emergency Relocation Personnel</u>, have been identified to perform or support the performance of OIG's essential functions at designated relocation facilities and are identified in <u>Table 2-3</u>, <u>Relocation Facilities</u>.

OIG will occupy Departmental relocation sites as well as specific relocation facilities in Regional areas. At the various relocation facilities, deployed personnel will comply with the facility security and access instructions to enter the designated work area.

OIG personnel have been issued OIG credentials to aid in this process. In addition, ERG members should be provided with the following when assigned to an ERG and each fiscal year thereafter:

- ERG Assignment Letters
- Blanket COOP Travel Authorizations
- Blanket COOP Property Passes
- Medical Information Forms (Exhibit E)
- Telecommunication Equipment
- Government Emergency Telecommunication Service (GETS) and Wireless Priority Service (WPS)

The priority of work for ERG members should be:

- 1. Notify the DOL Emergency Operations Center (EOC) of the operational status of the relocation facilities.
- 2. Reestablish contact with other OIG, regional, and program offices.
- 3. Reestablish business processes with government and

industry points of contact.

- Monitor the status of the emergency situation and report the status to senior management; this includes the status of facilities and other assets in the agency.
- 5. Maintain and report time and attendance for deployed and non-deployed employees.
- 6. Determine status and location of all OIG agency personnel to include supporting contractor personnel.
- 7. Sustain the DOL OIG's essential functions from the relocation facility.
- 8. Ascertain billeting and subsistence arrangements for deployed employees.
- 9. Establish an event log to collect significant functional activity and resource expenditures.
- 10. Establish or re-establish communication with/within the OIG network.

Since the COOP plan may be activated during working or nonworking hours and with or without warning and ERG members may be notified at any time to deploy to the relocation facility and perform their assigned roles for the duration (minimum 30 days), ERG members should prepare <u>Exhibit C, Personal Drive Away Kits</u> and ensure personal affairs can be maintained. An ERG assignment needs to be discussed with family members and they need to be included in any plans to ensure the ERG member can relocate with minimal distraction.

2.3 Vital Records and Critical Systems

Vital records critical to minimizing disruption of essential functions have been identified and will be protected.

OIG National and Regional offices will ensure those critical systems, databases, and other references supporting essential functions of the OIG are pre-positioned at designated relocation facilities, carried with personnel as they relocate, or available through a backup process involving online systems and/or paper hard copies. A summary of the agency's vital records is provided in Exhibit A, Table 2-4, OIG Vital File, Record or Database. The two types of vital records are defined as follows:

Emergency Operating Records

Records that are essential to the continued short-term functioning of DOL during and immediately following the emergency as well as to the ultimate reestablishment of the agency after the emergency. Included are:

- 1. emergency plans, manuals, and directives that provide agency staff with guidance and information for conducting operations during an emergency;
- 2. records necessary to perform essential functions during and immediately following an emergency; and
- records necessary to return to normal agency operations after the emergency

Rights and Interest Records

- 1. Rights Records are files critical to carrying out essential legal and financial responsibilities, contracting, acquisition, property and inventory records.
- 2. Interest Records are files critical to protecting individuals directly affected by DOL activities such as official personnel files, social security, payroll, retirement, insurance, and beneficiary records.

(b) (7)(E), (b) (7)(F)



The

provides a repository for information such as:

- 1. COOP Authorities
- 2. Plans and Procedures
- 3. Roles and Responsibilities
- 4. Orders of Succession
- 5. Delegation of Authority
- 6. Vital Records and Information Databases And Critical Systems
- 7. Critical Infrastructure
- 8. Disaster Preparedness
- 9. Organizational and Contact Information
- 10. Operational Reports and Distribution of Incident Status (e.g. SITREP, Executive Brief, etc.)

(b) (7)(E)

Each member of the OIG Executive Staff, Deputy Assistant Inspectors General (DAIG) and the OIG COOP Coordinators will have access to the

Additional Information is available in the (b) (7)

2.4 Interoperable Communications

While deployed, essential personnel will be able to communicate via several methods. The following communications methods will be used during relocation, in the order in which they appear:

- 1. Landline Telephones with Government Emergency Telecommunications System (GETS) for selected officials
- 2. Cellular Telephones (Private And Government) with Wireless Priority Service (WPS) for selected officials
- 3. Email (Dial-In/Remote Access)
- 4. Internet
- 5. Hand Held Wireless Personal Digital Assistants (PDAs)
- 6. Hand Held Radios

It is imperative that redundant communications be established.

2.5 Orders of Succession

Secretary memorandum, dated October 14, 2004, established the order of succession for the Department of Labor. Orders of Succession are needed for senior leadership authority. Federal agencies and key departments and offices are responsible for establishing Orders of Succession to ensure that leadership and management responsibility are maintained during a COOP event.

The Inspector General is responsible for the continuity of OIG essential functions. If the Inspector General is unavailable during COOP plan implementation, formal authority for related duties fall to the Deputy Inspector General or appropriate individuals in the OIG succession plan as outlined below:



In the event the entire executive staff of the OIG is incapacitated, succession will first revert to

If all OIG leadership is unavailable, then the who is fully capable to assume the leadership role as outlined in <u>Section 4.3 Devolution of Operations</u> and resume essential functions.

2.6 Delegations of Authority

Operational control of the OIG during a contingency will be under the direction of the Inspector General.

In the event the Inspector General is incapacitated, all subsequent successors as listed above will act with full authority as the Agency Head.

Following COOP plan implementation, the Inspector General or his successors will deploy to the designated relocation facility and assume the operational control of OIG.

Successors will function in accordance with all applicable statutes and guidance that governs OIG activities.

2.7 Relocation Facilities

The Department's primary and alternate relocation sites where normal business activities are curtailed are the following for the three "levels" of emergency:

Table 2-3. Relocation Facilities				
Duration of Event	DOL Executive Staff (Inspector General and Protection Units)	Advance Team	Contingency Staff	OIG Staff
	(b) (7)	(E),	(b)	(7)(F)
For	additional information see			

DAIGs and office managers maintain communication with staff and communicate with OIG Executive Staff. Staff should provide status, location and contact information to office manager within 24Hrs. If employees can not contact their supervisor, the employee should call toll-free 1-877-DOL-SAFE or 1-877-365-7233.

C FOR OFFICIAL USE ONLY

2.8 Support from Teleworking Employees

OIG's COOP plan relies on teleworkers in emergency situations to support Emergency Relocation Personnel in performing OIG's essential functions.

Since designated Emergency Relocation Personnel can not have all the necessary skills or access to systems and records that may be needed, additional employees will telework from home or any other locations as a virtual resource to provide access to resources that may not be available otherwise. These employees are expected to remain in contact and provide support and assistance to the Emergency Relocation Personnel.

Exhibit A, Table A-2, Emergency Relocation Personnel table identifies employees who should have the capability to telework to support the Emergency Relocation Personnel.

To ensure these employees can to support Emergency Relocation Personnel during an emergency, managers should ensure these employees periodically test their capability to access vital records and systems and communicate with colleagues and clients from remote locations. The tested ability to work from a remote location under normal conditions will help ensure the capability during an emergency.

See <u>OIG's Inspector General Directive (IGD) 4-600, Telework</u> <u>Program</u> for specifics on how to implement OIG's Telework program.

2.9 "Drive Away Kits"

Emergency Relocation Personnel must be prepared to quickly relocate under uncertain circumstances. Each member should develop and maintain a Exhibit C, Personal "Drive Away Kits" Checklists that contains both a Personal Items Checklist for clothing, toiletries, prescription medication, and other personal items that will be needed and a Personal Affairs Checklist that should be discussed with your family to ensure personal affairs can be maintained if deployed to a COOP site.

Emergency Relocation Personnel are reminded to bring their OIG laptop computer (if possible), cell phone, two-way pager, Personal Digital Assistants (PDA) devices, and any other device used for communication at the alternate work site. In addition to these materials, prepare a personal digital "Go-Kit" for important information, such as important phone numbers, account numbers and other personal information.

Basic office supplies and equipment will be provided for all deployed personnel (i.e., paper, pens, telephones, computers, printers, copy machines, and facsimile machines).

2.10 Emergency Information and Medical Form

All <u>Emergency Relocation Personnel</u> should complete an <u>Exhibit D</u>, <u>Emergency Information and Medical Form</u>. All personnel should include copies of your medical insurance card and blood donation card and provide them to the OIG's COOP Manager in a sealed envelop with the individuals name on it.

An individual's Emergency Medical Information will remain confidential and unopened unless an emergency requires the information to be provided to emergency medical personal.

Emergency Medical Information should be updated at a minimum yearly or when significant changes make the information obsolete.

3.0 CONCEPT OF OPERATIONS

The COOP plan is activated in response to an emergency situation or any other situation that disrupts normal operations in the OIG. The plan can be implemented fully or in part. The decision to implement the COOP plan is tailored to the specific situation and is based on the situation's projected or actual impact on the performance of essential OIG functions.

3.1 COOP Implementation

One of the following entities will direct full COOP plan implementation during an emergency situation affecting the entire Department:

- 1 Secretary of Labor During an emergency situation that affects DOL operations, the Secretary, the Deputy Secretary and the Director of the Emergency Management Center, should consult regarding full COOP plan implementation at the agency level. The Secretary may also elect to implement the COOP plans following an elevation of the threat-level by the Homeland Security Advisory System (HSAS). See for the HSAS threat condition information.
- 2 Inspector General During an emergency situation affecting the habitability of agency buildings, the Inspector General or his delegate should consult with the Director, Emergency Management Center regarding full COOP plan implementation. The Inspector General and Director, Emergency Management Center may also elect to implement the COOP plan following an elevation of the HSAS.

During a national emergency that affects, or has the potential to affect, the continuity of federal government operations, the President might require all federal departments and agencies to initiate COOP implementation. The Secretary would then direct the activation of the Departmental and subordinate Agency COOP plans.



The Department of Labor Agency Executive Committee and the Secretary will direct partial COOP plan implementation during an emergency situation affecting only a limited portion of the agency. Upon notification to effect or implement the COOP plan, the Inspector General and Special Agent in Charge of the Secretary's Protection Detail will be notified and directed with an initial course of action.

The initial notification and guidance will be broadcast throughout the OIG by senior management through several mediums inclusive of telephonic notification and our wireless e-mail capability. Dependent on the contingency, situational information will be immediately passed to the directly affected OIG personnel as a priority and then to the remainder of the OIG as time and the situation permits.

Should the event be **building or area specific for less than** hours in the national office the IG will move to (b) (7)(E)

(b) (6) Executive <u>Staff and employees</u> will remain in the Evacuation Assembly Areas

Should the event be <u>building or area specific for more than</u> <u>hours</u> in the national office the IG and COOP Advance Team will move to (b) (7)(E)

Executive Staff may be transported to the from the assembly areas if the situation warrants continued operations outside the building. Transportation will be provided by assets to the office. Other employees will be released to go home.

Should the event be **City-Region Wide**, the DOL EMC may order relocation to the (b) (7)(E) The OIG Relocation Teams will relocate using POV, OIG Vehicles or the use of rental cars; see Exhibit D – Car Rental Information. Other employees will be released to go home, telework or relocate to a safe area.

Each OIG component, as the initial priority regardless of the time of the contingency, will account for assigned employees and provide an accountability status to the OIG COOP Coordinator. The OIG COOP Coordinator will notify both senior OIG management of the status of employees and the EMC. The OIG COOP Coordinator will serve as a liaison to the EMC during potential or actual contingencies.

3.2 Team Positions

Several leadership positions are essential to the effective activation and execution of the COOP plan.

Position	Responsibility
OIG COOP Coordinators	The OIG Agency EMWG member selected to act as the COOP Coordinator for the agency coordinates with executive leadership during any emergency to assess the situation and determines whether an emergency exists requiring the activation of emergency procedures. Also leads planning and response efforts.
Advance Team Leader	Serves as the point of contact for the agency team tasked with preparing the relocation facility for full occupancy.
Relocation Team Leader	Serves as the point of contact for all essential personnel needed to facilitate the continuation of essential functions.

Table 3-1. COOP Team Positions

Because space and support capabilities at the relocation facility will be limited, the number of personnel to be relocated is restricted to the minimum number with the skills and experience needed for the execution of the agency's COOP plan and essential functions. Some OIG personnel may be asked to Telework from home, or remain at home awaiting further instructions.

(b) (7)(E), (b) (7)(F)

3.3 OIG COOP Teams

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Table 3.2 – Emergency Response Teams			
Team Team Members	Responsibilities		
(b) (7)(E), (b) (7)(F)	 Activate Emergency Notification System. 		
	 Prepare the relocation facility by setting up computer systems, internet access, and telecommunications. 		
	 Coordinate with relocation facility host personnel and provide logistic support. 		
	 Maintain communications with Operations Element. 		
	 Execute essential agency functions. 		
	 Coordinate with key agency officials. 		
	 Provide Protection to DOL Leadership. 		
	 Provide Law Enforcement functions and coordinate with other law enforcement agencies. 		
	 Provide administrative and financial support for essential agency functions. 		
	 Provide legal support to Operations Element. 		
	 Establishing IT capability at (b) (7)(E) back- up site necessary to carry out COOP operations. 		
	 Set up and maintain systems, networks, software, and interoperable data communications. 		
	 Provide support for facility infrastructure, such as lighting, power, HVAC, and water supply. 		

4.0 PLAN IMPLEMENTATION

To facilitate a structured implementation process, the COOP plan is implemented in three phases:

- 1. Activation and Relocation Occurs immediately following the decision to implement the plan and prompts the relocation of essential personnel
- Emergency Relocation Facility Operations Must be performed(b) (7)(E) of COOP plan implementation
- 3. **Reconstitution of Normal Operations** Begins when the threat is diminished to a safe level.

If plan implementation is required, the appropriate response level is determined, including whether to implement the COOP plan partially or fully.



Figure 4-1. COOP Plan Implementation Decision-Making Process

Additional Information is available in the DOL COOP Plan - Appendix R.

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4.1 Activation and Relocation

The Inspector General or appropriate designee has the authority to alert, activate, and mobilize the OIG emergency organization. In the event of an emergency situation or disaster, the Inspector General will be responsible for notifying OIG personnel and the Office of the Secretary of his intent.



Figure 4-2. COOP Activation and Relocation

Should the central computing facility become unavailable, an immediate "fail over" to the back-up system will be initiated and services reestablished.

Immediate notification will be provided to the EMC at which time continual communication will be effected. OIG emergency team personnel will be notified as soon as practical as to prepare them for possible deployment to designated relocation sites.

Emergency notification may be communicated through different media sources, including:

- 1. Public Announcement System
- 2. Internet
- 3. OIG Intranet website(s)
- 4. Electronic Mail (e-mail)
- 5. Recorded Telephone Messages
- 6. Cellular and landline phones
- 7. Announcements on local radio and television outlets
- 8. In-person communication

Should the contingency event occur at a Regional worksite, OIG Regional personnel will immediately notify local and Departmental emergency responders followed by the National Headquarters with details of the contingency. A determination will be made in coordination with Regional OIG components and the National Headquarters on the continuance, abeyance or transfer of OIG functions.

In any case, the events to be accomplished either Nationally or Regionally, which may be accomplished simultaneously, upon notification, are:

- 1. Notify appropriate OIG management and OIG emergency personnel.
- 2. Notify, account for and provide initial instructions to all OIG personnel in affected area.
- 3. Notify and establish contact with the EMC and report on OIG personnel status.

- Verify transportation and support arrangements for OIG emergency personnel who may be required to deploy to relocation sites.
- 5. Ensure OIG personnel have required credentials necessary during the contingency.

Relocation may be necessary dependent upon the situation and status of affected OIG occupied facilities. In the event OIG operations are shifted to a relocation facility, that facility must be capable of supporting the direction, control and execution of critical missions and functions until full operations are restored.

To prepare and actually relocate OIG will:

- 1. Verify the status of the relocation site for operational integrity.
- 2. Establish contact with each deploying member.
- 3. Provide situational information to deploying members to aid in deployment.
- 4. Notify OIG personnel near the relocation sites of the arrival plans to the Relocation team where applicable.
- 5. Report the establishment of OIG activity at the relocation site to the EMC and OIG senior management.

Drawing lessons from past disasters, the Department has initiated a tollfree telephone number that will enable DOL to account and determine the status of employees in the event of an emergency.

Staff should provide status, location and contact information to their office manager within 24Hrs. If employees can not contact their supervisor, the employee should call the following toll-free number.



4.2 Relocation Facility Operations

Upon arrival at the relocation facility, OIG essential personnel will occupy a pre-configured work environment listed in (b) (7)(E) to support OIG's essential functions. Alternates will be deployed in the event that a primary member of the relocation team is unable to deploy.

Except for OIG specific sites, the Department will be providing administrative and logistical support. Primary responsibilities of the logistics and administration function include:

- 1. maintaining communications and information technology support,
- 2. maintaining supply, and
- 3. lodging.

During COOP contingencies, it is expected that the working hours of most essential personnel will be similar to normal non-emergency periods. However, certain members of the agency staff may need to be prepared to support a 24-hour-per-day, seven-day-per-week operation.

OIG management will make allowances based upon the situation for the exchange of personnel at the relocation site when necessary.

4.3 Devolution of Operations

In the event that OIG leadership, as outlined <u>Section 2.6</u>, <u>Orders of</u> <u>Succession</u>, is unavailable or incapable to resume essential functions, OIG leadership will (b) (7)(E), (b) (7)(E)



OIG leadership functions will be assigned as follows.

Table 4.1 Devolution Responsibilities			
Management Team	Responsibilities		
(b) (7)(E),			

Each Regional Office will develop plans for the assumption of responsibility for the OIG's operational control of activities. First priority will be to establish communication with the DOL EMC with the effective date and time of the transfer of authority and the senior leadership structure in that office.

Additional Information is available in the (b) (7)(E)

4.4 Reconstitution

Planning for reconstitution will begin immediately and concurrently with current operational activities during a contingency. However, reconstitution procedures will commence when the *Secretary* confirms that the emergency situation has ended and is unlikely to recur. The termination of the COOP plan activation triggers essential personnel and non-deployed staff to return to DOL agency offices to resume normal business operations.

Depending on the nature of the emergency, there may be severe destruction of physical property and it may be necessary to rebuild the OIG affected offices or resume work at another location. In this circumstance, the following options will be considered:

- 1. Continue to operate from the current relocation facility;
- Begin to reconstitute OIG agency operations at another location;
- Shift OIG operations between OIG offices not affected by the contingency; or
- 4. Make use of the OIG mobile workforce computing capability.

Once a determination has been made to reconstitute, the forward planning of the OIG Executive Staff during the actual contingency will:

- 1. Establish planning and working groups to facilitate reconstitution efforts;
- 2. Notify appropriate OIG personnel; and
- 3. Identify required resources to reconstitute.

Reconstitution may require transferring essential functions and their control to the reconstituted facility. After reconstitution, EM staff should construction an after action report with lessons learned for the evaluation and refinement of this COOP plan.

4.5 Critical Incident Response Program

Planning for reconstitution will begin immediately and concurrently with current operational activities during a contingency. However, reconstitution procedures will commence when the *Secretary* confirms that the emergency situation has ended and is unlikely to recur. The termination of the COOP plan activation triggers essential personnel and non-deployed staff to return to DOL agency offices to resume normal business operations.

Inspector General Directive (IGD) 4-1610, Critical Incident Response Program (CIRP) prescribes the policy and procedures that provide a Critical Incident Response Program to assist all OIG employees involved in a critical incident.

The CIRP provides the peer support and aid of the Critical Incident Response Team (CIRT) and other Mental Health Professionals, in a confidential manner to mitigate the adverse effects of a critical incident through peer counseling, family assistance and support, referrals and follow-up services. The Critical Incident Response Program is available to help all OIG employees and their family members to readjust to life following a traumatic incident.

The on-site manager should immediately contact the CIRT Coordinator or CIRT member(s), if they are nearby, and their respective AIG to report the situation. The CIRT Coordinator makes an assessment of the nature of the incident and determines whether CIRT member(s) (if not already present) and/or a Mental Health Professional needs to be obtained. The CIRT members (if not already present) are dispatched to the office where the incident occurred to do an on-site assessment to determine the severity of the situation, the resources needed to assist the employee(s) and/or their family(ies) and if the services of a Mental Health Professional (MHP) are need.

For additional information on the <u>CIRP</u>, see Inspector General Directive (IGD) 4-1610, Critical Incident Response Program.

5.0 Tests, Training and Exercise Program

Testing, training and exercising (TT&E) COOP capabilities are necessary to demonstrate and improve the ability of the OIG to execute its essential functions. The OIG's TT&E program will be developed to incorporate the three functional areas of testing systems and equipment, training personnel, and exercising plans and procedures.



Additional Information is available in the DOL COOP Plan - Appendix T.

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5.1 Tests

Tests of the agency COOP plan procedures will include the following:

- 1. Evaluation of alert and notification procedures and systems, including instructions for moving to relocation facilities. These tests will be conducted with and without warning, and during working and non-working hours.
- 2. Evaluation of the process for accessing vital records, systems, and data management software and equipment necessary to perform essential functions at the relocation facility.
- Evaluation of interoperable communications inclusive of wireless technology and automation fail-over.
- 4. Evaluation of the logistical support, public and vendorprovided services, and infrastructure systems (e.g., water, electrical power, heating, and air conditioning) at the relocation facilities.
- 5. Evaluation of the communication processes to continue performing OIG essential functions. Inclusive of the vetting process to provide law enforcement support.

The Inspector General or designated OIG COOP official will keep track of all areas identified for correction or improvement that need to be addressed in the yearly update of the COOP plan.

5.2 Training

Training familiarizes agency staff with the essential functions they may have to perform in an emergency. All OIG agency staff must have a basic understanding of emergency procedures and COOP plan execution. In addition senior leaders and COOP team members will be trained to perform COOP operational tasks with proficiency to support the agency's essential functions in an emergency.

COOP training will consist of a combination of the following:

- 1. Situational awareness training for all employees.
- 2. Orientation for all agency staff concerning emergency procedures and responsibilities.
- 3. Training for senior leadership, focusing on decision-making roles and responsibilities.
- Training for essential personnel with responsibility for agency team capabilities, to ensure that members understand their individual roles and their interaction with their counterparts.
- 5. Annual refresher training for all agency staff.
- Basic crisis management orientation training for select OIG emergency coordinators to establish a basis of knowledge. This training may be acquired from the National Fire Training Academy in the form of correspondence courses if not available from the Department.

Attendance at disaster preparedness training for functional OIG emergency personnel will allow the preparation of up-to-date technical support and plans.

5.3 Exercises

Exercises provide the opportunity to affirm knowledge learned during training and practice the steps they would take responding to simulated emergency conditions in a COOP situation. The exercise schedule includes:

- 1. Annual activation of the agency COOP plan requiring actual or simulated movement to a relocation facility
- 2. Semi-Annual exercise for OIG Agency teams; this may be in the form of a tabletop exercise with preplanned scenario events or it may involve the actual notification and relocation, with actual use of the facilities at a relocation facility, or some combination of these two approaches
- 3. Semi-Annual exercise for OIG personnel in the form of mini preplanned simulated scenario events to evaluate employee awareness and knowledge of emergency procedures.
- 4. Executive leadership tabletop exercises/discussions to evaluate and refine current and future planning efforts.

Exercise participants will conduct a post exercise evaluation session at the completion of every exercise to capture lessons learned for possible revisions to the COOP plan.

6.0 PLAN MAINTENANCE

OIG is responsible for monitoring the elements of the COOP plan regularly and making modifications ensures the plan remains executable.

Management of the COOP plan and training program will also be the responsibility of the OIG Emergency Planning Officer. OIG National and Regional offices will assist in keeping applicable sections of the plan current based.

In addition, the OIG has established an OIG Emergency Management Work Group (EMWG). This workgroup is charged with refining and delineating the plan. Additionally, this workgroup will provide an information source to OIG employees as well as determine the need for specific training within the OIG for all emergency response considerations.

COOP plans at the National and Regional levels of the OIG will be updated annually unless there is a significant change.

Supporting team assignments, specific responsibilities, personnel changes, emergency data and procedure will be reviewed and updated quarterly, as a minimum, and as specified by the Homeland Security Advisory System (HSAS) on the following page.


The appendices for the COOP plan provide a combination of detailed, operational information critical to the successful implementation of the plan and general guidance in support of COOP planning.

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ESSENTIAL FUNCTIONS, ESSENTIAL PERSONNEL, VITAL RECORDS, DATABASES, AND LOCATIONS

This Exhibit identifies the essential functions that must be performed under the COOP plan guidelines, the essential personnel responsible for carrying out these functions, the vital records and databases to which essential personnel will need access, and the location from which the essential personnel will be working following COOP plan implementation.

In addition to the necessary items listed in the following tables, the following items will be available at the relocation facility following COOP plan implementation:

- 1 Computers with standard DOL software and shared drive access
- 2 Telephones with voice mail capability
- 3 Printer
- 4 Facsimile machine
- 5 Copy machine
- 6 E-mail
- 7 Internet/Intranet.

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TABLE A-2. EMERGENC' LOCATION PERSONNEL

EMERGENCY RELOCATION PERSONNEL - OIG OPERATIONS UNIT

Essential Personnel	Support Role	Team Assigned	Office Telephone	Wireless Telephone	E-Mail
(D) (1)(E), (D) (1	7)(F)				
	DIG	Relocation			
	AIG OLRFI				
	AIG Audit				
	AIG OLRFI				
	DAIGA				
	DIO				
	AIG Audit				
	DAIGA				
	OAO				
	AIG OMAP				
	DAIGA				
	DTAS				
	Counsel				
	AC	12	(b) (7)(C)	(b) (7)(C)	(b) (7)(C)
	AC			-	
2 nd	Alternates wo	uld only reloca	ate to if	primary or 1 st alte	ernate is unable.

Information for Executive and Contingency Staff is available in the DOL COOP Plan - Appendix

Essential Personnel	Support Role	Team Assigned	Office Telephone	Wireless Telephone	E-Mail
b) (7)(E), (b) (7	7)(F)				
		Relocation	(b) (6)		
	ASAC		(h) (7)		
	ASAC		<mark>(b) (</mark> 7		
rotection Unit (Deputy Se	ecretary)				
	AIG OISI	Relocation	(b) (6)		
	ASAC		(b) (6) (7) (7)		
	ASAC		$(\mathbf{D})(\mathbf{I})$		
IMHSA Protection Unit					
	Washington		(b) (6)		panella.robert@oig.dol.gov
	ASAC		(h) (7)		
	ASAC		(D) (I		
	Philadelphia		(b) (6)		turpin.william@oig.dol.gov
	ASAC		(b)	7\/_	
	ASAC		(b) (

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ssential Personnel	Support Role	Team Assigned	Office Telephone	Wireless Telephone	E-Mail
formation Technology	y Back-up Si	te (Atlanta)			
	IT		(b)	(6)	

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MSS - Administrative Support







TABLE 2-4. OIG VITAL FILE, RECORD, OR DATABASE TYPES OF If Manual If Electronic Form Of RECORDS Classification Description Record Vital File, **Alternate Site** POC Record, Or Location Telework Emergency Operating Electronic Pre-Position Database Rights & Interest Manual Hand Carried Accessible OMAP YES UNCLA UNCLA OMAP YES Systems Maintained and Managed by Others OLRFI YES UNCLA (With Specific Secure Laptops) **ESSENTIAL FUNCTION # 4: Provide Audit and Administrative Assistance**







TABLE 2-4. OIG VITAL FILE, RECORD, OR DATABASE TYPES OF RECORDS If Manual If Electronic Form Of Classification Description Record **Alternate Site** Vital File, POC Record, Or Location Telework Emergency Operating Electronic Pre-Position Rights & Interest Hand Carried Database Manual Accessible YES OA UNCLA OMAP NO (Conversion UNCLA to Electronic Record Planned) OMAP UNCLA YES OMAP UNCLA YES OMAP YES UNCLA







TABLE 2-4. OIG VITAL FILE, RECORD, OR DATABASE TYPES OF RECORDS If Manual **If Electronic** Form Of Classification Description Record **Alternate Site** Vital File, POC Record, Or Location Telework Emergency Operating Electronic Pre-Position Hand Carried Rights & Interest Database Manual Accessible OMAP YES UNCLA YES OMAP UNCLA

EMERGENCY RELOCATION FACILITY GUIDE

In the event of full COOP plan implementation (i.e. critical agency buildings are rendered uninhabitable), essential personnel will deploy to the predesignated DOL relocation facility to perform essential functions.

OIG personnel will be able to enter each relocation site using issued OIG badges and credentials along with DOL employee badges.

- The items and actions listed below are intended to ensure operational readiness of the individual. While not all-inclusive, the listed actions are intended to increase individual readiness through the understanding of the mission, roles, and responsibilities. The list also encourages planning for and consideration of logistical and administrative matters.
 - Know individual COOP roles and responsibilities
 - Maintain office "drive-away kit" (mission-related work materials)
 - Be knowledgeable and have the ability to coordinate and present national-level information
 - Know deployment procedures
 - Have an updated and readily available Point of Contact (POC) list
 - Provide contact information to POC and Operations Site
 - Ensure appropriate badges and clearances are valid

(b) (7)(E), (b) (7)(F)



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Additional Information is available in the DOL COOP Plan – Appendix H.

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Should the event be **building or area specific for more than** the national office the will move to

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Executive Staff may be transported to the

from the assembly areas if the situation

warrants continued operations outside the building. Transportation will be provided by the SAC of WROI using assets to the office.

Other employees will be released to go home or telework.





Additional Information is available in the DOL COOP Plan - Appendix I.

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In the event of a city-wide or catastrophic event, the (b) (6) is the alternate work site for Executive and Contingency Staff members to continue performing their DOL essential functions.

Other employees will be released to go home, telework and/or relocate.







Additional Information is available in the DOL COOP Plan - Appendix K.

Personal "Drive-away Kits" Checklist

Personnel can receive Notifications and/or Deployment instructions from a variety of sources at a moments notice. Personnel shall assemble their personal "drive-away kit" so it is readily available. When planning for a possible extended deployment, personal needs, preferences, and comforts related to health, medical, physical, and emotional needs should be considered.

While not all-inclusive, the list below includes basic personal items that could be included in the personal "drive-away kit." When preparing the "drive-away kit," a variety of weather conditions should be considered.

The kit should be pre-packed and easily accessible. The kit size should be limited to one bag or suitcase and a small hand carried bag.

	C-1. Drive-Away Kits Checklist					
Category	Basic Personal Items					
Clothes	Casual, Work, Indoor, Outdoor & Exercise (4 changes)					
1	Underwear					
	Night clothes (pajamas, night-gown, robe, slippers)					
	Shoes (work, relaxation/exercise, shower)					
Recreation	CDs & CD player, radio, MP3 or iPod, headphones					
	Books and magazines	-				
	Cards, games, puzzles					
	Stationery, stamps, address book					
Toiletries	Toothbrush & Toothpaste					
	Soap, Shampoo & Deodorant					
	Shaving needs & cosmetics					
	Nail clippers					

	C-1. Drive-Away Kits Checklist	
Category	Basic Personal Items	
	Hair brush & comb	
	Hair dryer & curling iron	
	Other personal hygiene items	
Medical	Prescription Drugs, Over The Counter Medicines	
(extended supply)	Dietary Supplements	
	Contacts & Solution (extra contacts)	
	Hearing Aid & Extra Batteries	2
	Health & Prescription Cards	
	Extra Reading Glasses & Sun Glasses	
Miscellaneous	Identification Cards/Badges	
	Drivers License	
	Cash for Expenses, ATM Card	
	Coins For Vending Machines	
	Credit Cards (Personal & Government)	
	Emergency Kit For Automobile	
	Earplugs	
<i>.</i> *	Flashlight & Batteries	
	2-3 Trash Bags	
	Alarm Clock	
	Sewing Kit	

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Personal Affairs Checklist

In the event of an extended deployment, it is important that your personal affairs be organized and discussed with appropriate family, friends, or confidants. A family support plan should be developed. The following checklist will help to ensure that the necessary information or files are available to address and resolve issues that may arise during the Member's absence. It is critical that an individual(s) be selected to look after your family, pets and personal affairs during your absence.

	C-2. Personal Affairs Checklist	
Category	Basic Personal Items	
Important Telephone Numbers	Family Members & Friends	
	Family Members' Workplace	
	Attorney & Clergy	
	Doctor & Dentist	
	Veterinarian	
	Mechanic/Car Dealership	
	Plumber & Electrician	
	Police & Fire	
	Schools, Instructors & Childcare	
	Utilities (Water, Electric, Telephone)	
Important	Will & Power Of Attorney	
Records And Documents	Social Security Numbers	
(Location)	Medical & Dental Records	
	Veterinarian Records	
	Life Insurance Policy	
÷	Automobile Policy	

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	C-2. Personal Affairs Checklist	
Category	Basic Personal Items	
	Health & Medical Policy	
	Birth & Marriage Certificates	
	Citizenship/Naturalization Papers	
	Passports	
	Direct Deposit, Auto Debit, & Allotments	
Policy	Life	
Information (Number,	Health	
Amount, Location)	Dental	
,	Homeowner	
	Automobile	
Financial	Savings & Checking	
Accounts (Number,	Money Market & Mutual Fund	
Balance, Location)	Bonds, Stocks, & CDs	
	Loans	
	Safety Deposit Boxes/Keys	
Credit	Credit Cards	
Accounts and Other Bills	Mortgage/Rent	× .
(Number And Balance)	Utilities	
,	Other Bills (Type & Frequency)	
Memberships	Health Clubs	
(Number, Dues,	Shopping Clubs	
Location)	Travel Clubs	

	C-2. Personal Affairs Checklist	
Category	Basic Personal Items	
	Professional & Social Organizations	

Additional Information is available in the DOL COOP Plan - Appendix L.

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EXHIBIT D



DEPARTMENT OF LABOR

CONTINGENCY STAFF MEMBER INFORMATION

Name:	Ager	ncy:	
Home Address:			
Phone Numbers: (H)_	(W)	(C)	
Primary Name		be contacted in an emergend	
Phone Numbers	(H)(W)(C)	
		W)(C)	

Role of Contingency Staff Member:

A Contingency Staff Member is an employee selected by hislher supervisor who will form the core of the Department of Labor or Agency Continuity of Operations (COOP) Team. The Contingency Staff Member will relocate to an alternate site when essential functions can no longer be accomplished at the permanent or primary worksite. Selection of Contingency Staff is a vital component of the Department's continuity program, and is based upon the following criteria:

- Is knowledgeable of their role and responsibility as a Contingency Staff member in support of both OIG and Department essential functions, and is committed to full participation in the event of either natural or manmade emergency.
- Has the full confidence of the Secretary and/or the Inspector General to perform duties as assigned during a COOP-related emergency.
- Is knowledgeable of the Department of Labor National Office, OASAM and OIG COOP plan.
- Is prepared to take the appropriate actions necessary to immediately deploy to the alternate relocation site in an emergency situation in order to support the implementation of the Department and/or OIG COOP plan.

Responsibilities/Requirements:

- Familiarity with the Department of Labor National Office, OASAM and OIG's COOP plan
- Participates in annual COOP training facilitated by the DOL Emergency Management Center (EMC)
- Maintains ability to telework from the alternate relocation site
- Maintains emergency back-up documents (Vital Records)
- Maintains communications technology (Blackberry PIN, GETS card, DOL laptop, cell phone)*
- Has identification and access badge(s) to alternate relocation site(s) (as needed)
- Has a government travel credit card*
- Maintains a personal "Go Kit" of packed, storable clothing (enough for a week) and personal hygiene items based on guidance provided by the EMC (if "Go Kit" is not prepared, members elect to purchase necessary items)
- Has well-maintained vehicle or emergency transportation plan in-place for deployment to the alternate relocation site (if member does not have transportation, member will coordinate transportation with Agency COOP Team)
- Has a family and/or pet emergency plan (i.e., transportation, relocation, financial, Power of Attorney, etc.) (See <u>www.Ready.gov</u>)
- Maintains at least a months' supply of medication (if applicable), as well as professional medical contact information)
- Reports as directed to the COOP alternate relocation site, upon activation of the DOL and/or OIG COOP plan
- Maintains availability for COOP deployment, as directed by Supervisor
 Voluntarily completes attached Medical History Form
 - * May not apply to contractor personnel

"I have been briefed, and 1understand the requirements and responsibilities incurred by me as a member of the Department of Labor Contingency Staff."

Employee Signature and Date

Supervisor Name (Print)

Supervisor Signature and Date

MEDICAL HISTORY

information is by manageme Operations Plan to provide y providers in order to obtain to	ent in charge of you with medica treatment. <u>Pro</u>	relocation centers al care you may nee viding this informa	used in connection with the D ed while at a relocation center.	his information. The primary use of the epartment of Labor's Continuation of This may involve disclosures to mea. bose not to provide this information, it but, if such care is needed.
PLEASE COMPLETE THIS CONFIDE PRINTING OTHER INFORMATION AS		NNAIRE AS ACCURATE	LY AS POSSIBLE BY PLACING (X)	MARK IN THE APPROPRIATE SPACES AND
1. IDENTIFICATION				
LAST NAME	F	FIRST	MIDDLE	BIRTH DATE
EMERGENCY CONTACT PERSON		RELATIONS	HIP TELEPHONE N	UMBER
PRIMĄRY PHYSICIAN		Physician's Address	S	TELEPHONE NUMBER
2. ALLERGIES			3. IMMUNIZATION	
To which of the following are yo Drugs (specify below)	Pollen	 None Food Other (specify be 	Have you received He If yes, number of shots elow) Year Completed	s? 🗌 1 🗌 2 🛄 3
Specify:			Year of last tetanus bo	poster
			If born after 1956, date	e of last measles booster
4. Advanced Directives/Living Do you have an Advanced Dire	Contract Contractor	II? □ Yes □	No If yes, Name Of Executo	or:
5. MEDICATIONS			6. MEDICAL HISTORY	
Which of the following do you ta □ None	ake more than (once a week?		onditions have you ever had?
□ None □ Acetaminophen (Tylenol)	□ Vitamins		.□ Head Injury □ Migraines	Active Tuberculosis
□ Acetaninophen (Tylenoi) □ Antacids	□ lbuprofen ((Advil/Motrin)	□ Migraines	
□ Antihistamines/allergy pills	□ Insulin/diat	And and a second se	□ Stroke	Hepatitis
□ Arthritis medication	□ Anti-Coagu	and a second	□ Glaucoma	
□ Aspirin	□ Stomach/ir		Cataracts	□ Bladder infections
□ Birth control pills	Thyroid me		Thyroid condition	□ Kidney stones
□ Blood pressure pills	🗆 Tranquilize		Diabetes	□ Arthritis
Decongestants/cold pills	□ Hormone r		□ High blood pressure	Gout
Heart Medication			□ Heart murmur	Herniated disc
	in the state		Rheumatic fever	Autoimmune Disease
ist medications (prescription and ake:	I non-prescription	on) you currently	Heart attack	🗆 Anemia
IK 0 .			Pneumonia	Tumors
			Asthma	🗆 Cancer
			🗆 Emphysema	Depression/anxiety
			Other medical/psychiatric	o disorders – Specify
			1	
OIG		61		9/28/07

EXHIBIT E

CAR RENTAL INFORMATION

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DEFINITIONS

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Continuity of Operations Plan (COOP)	Plan to guide Federal departments and agencies in performing their essential functions from an alternate location during an emergency situation that renders their normal duty stations uninhabitable
COOP Facility Coordinator	Person identified from within the agency who will coordinate the deployment to the relocation facility and will be responsible for relocation facility logistics
Delegations of Authority	Pre-delegated authorities concerning who will make policy determinations and decisions at headquarters, field levels, and other organizational locations, as appropriate
Essential Equipment and Information	Equipment and information necessary for performing essential functions at the relocation facility
Essential Functions	Functions that are performed within DOL components that cannot lapse for a period of 30 days without adversely impacting DOL missions. These functions must be performed within 12 hours of COOP plan implementation and for a period of up to 30 days.
Essential Personnel	Pre-designated DOL staff who, in the event of COOP plan implementation, deploy to an emergency relocation facility to perform essential functions
Order of Succession	Ensures that DOL decision making is uninterrupted throughout an emergency
Reconstitution	The process of moving from or to the relocation facility to continue essential operations

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Vital Records and Critical Systems Essential agency records and information systems needed to carry out essential functions from the relocation facility. Vital records also include any legal and financial records that must be protected during an emergency situation. Vital records can be prepositioned at the relocation facility or transported in fly-away kits when deploying

EXHIBIT C

ACRONYMS

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COOP	Continuity of Operations
DEMC	Director, Emergency Management Center
DOL	U.S. Department of Labor
EO	Executive Order
EOC	Emergency Operations Center
FEMA	Federal Emergency Management Agency
FOC	FEMA Operations Center
FPC	Federal Preparedness Circular
GETS	Government Emergency Telecommunication Service
HSAS	Homeland Security Advisory System
HSPD	Homeland Security Presidential Directive
IS	International Services
IT	Information Technology
NO/EMT	National Office Emergency Management Team
EMC	Emergency Management Center
OEP	Occupant Emergency Plan
PDD	Presidential Decision Directive
PIN	Personal Identification Number
TT&E	Test, Training and Exercise
WPS	Wireless Priority Service

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8.0 DOL COOP APPENDICES

The appendices for the COOP plan provide a combination of detailed, DOL General and OIG Specific operational information critical to the successful implementation of the plan and general guidance in support of COOP planning. (These Appendices are contained in separate documents.)

Appendix A – Blank

<u>Appendix B – Line of Succession and Delegations of Authority</u> (OIG Specific)

Appendix C – Authorities and References (DOL General)

Appendix D – Essential Functions (OIG Specific)

Appendix E - Immediate Assembly Areas(DOL General)

<u>Appendix F – Executive and Contingency Staff Points of Contact &</u> <u>Alternate Work Sites (DOL General)</u>

<u>Appendix G – Frances Perkins Building Evacuation and Occupant</u> <u>Emergency Plan</u> (DOL General)

<u>Appendix H – (b) (7)(E), (b) (7)(F)</u>

Appendix I = (b) (7)(E), (b) (7)(F)

Appendix J - Blank

<u>Appendix K – The</u> (b) (7)(E), (b) (7)(F)

Appendix L – Personnel Readiness (DOL General)

Appendix M - Tools and Aids (DOL General)

<u>Appendix N – Vital Records</u> (OIG Specific)

Appendix O - Devolution of Operations Plan (DOL General)

<u>Appendix P – Communications and Important Phone Numbers</u> (OIG Specific) Appendix Q – Human Resources (DOL General) Appendix R – Crisis Communications Plan (DOL General) Appendix S – Sample Recall Plan (Restricted Access) (OIG Specific) Appendix T – Test, Training, and Exercise (DOL General) Appendix U – OASAM and EMC COOP Plans (DOL General) Appendix V – Pandemic Influenza Plan (DOL General) Appendix W – COOP-COG Integration Plan (DOL General) Appendix X – COOP-COGCON Matrix (DOL General)

OIG Manual

U.S. Department of Labor Office of Inspector General



Transmittal Sheet

Date: JAN 1 3 2004

IGD 3-200

MANAGEMENT OPERATIONS: Internal Inspection Program

This Inspector General Directive (IGD) revises the Office of Inspector General (OIG) Internal Inspection Program.

GORDON S. HEDDELL Inspector General

INSTRUCTIONS: Insert this IGD in Part 3, Management Operations section of the IGD section of the OIG Manual and remove IGD 3-200, Internal OIG Review Program, dated March 22, 1996, in its entirety.

OIG Manual

U.S. Department of Labor Office of Inspector General

Chapter: 3 – MANAGEMENT



Inspector General

Directive

Title: Internal Inspection Program

OPERATIONS

Number: 3-200

Date: JAN 1 3 2004

1. PURPOSE

This Inspector General Directive (IGD) revises the Office of Inspector General (OIG) Internal Inspection Program. It sets forth policy, delegates responsibilities, and explains procedures for the administration of the OIG Inspection Program by the Office of Inspection and Special Investigations (OISI). This revision rescinds IGD 3-200, Internal OIG Review Program, dated March 22, 1996, in its entirety.

2. SCOPE

The provisions of this IGD apply to all OIG component offices.

3. POLICY

The Office of Inspections and Special Investigations (OISI) is assigned the responsibility of conducting internal inspections of OIG programs and functions.

The inspection process is a positive, constructive process designed to improve the efficiency and work atmosphere of the operational unit being inspected and the OIG as a whole.

All OIG Headquarter components, regional offices, and field offices are subject to an office inspection at regular intervals.
4. **DEFINITIONS**

As used and set forth in this IGD, the following words are considered to have the noted general meaning or definition.

A. <u>Internal Inspection</u>. An internal inspection is a systematic review and analysis of OIG programs to determine the managerial, administrative and operational efficiency of an office.

B. <u>Inspection Checklists</u>. The Inspection Checklists consist of elements that make up the basic criteria of the inspection process. These lists provide a detailed cataloging of items and areas to be scrutinized during an inspection.

All checklists consist of two parts: "Information from the Office Manager" and "Inspection Review and Findings". The Information from the Office Manager section of each checklist consists of questions that the manager at the inspection site is required to respond to prior to the arrival of the inspection team. The Inspection Review and Findings are the basic guidelines for the on-site inspection. The purpose of each checklist is twofold:

(1) To guide the direction and scope of the inspection, but not limit the inspection. All administrative, managerial, and operational areas of the OIG are subject to a more detailed examination than provided by the checklist, if necessary.

(2) To provide a required level of standardization in the inspection process. Due to the diverse missions and functions of the OIG components, the checklists will vary between each component. However, the checklists within each component will follow the same format.

C. <u>Confidential Interviews</u>. The confidential interviews of employees provide a forum in which an employee may offer perspective on issues and operations, which are pertinent to the inspection. D. <u>Liaison Contacts.</u> The interviews of outside agencies are to assess the effectiveness of the office's working relationships with others and to express, on behalf of the IG, the OIG's gratitude for assistance provided by the official/agency being contacted.

E. <u>Review of Management</u>. Reviews will be conducted of the overall management of the office including personnel and assignments within an office.

F. <u>Review of Administration</u>. Reviews will be conducted of the administrative activities of the office to determine whether or not the office is fulfilling its administrative obligations.

G. <u>Review of Operations</u>. Reviews of investigative and audit activities will be conducted to ensure that investigations and audits are conducted in accordance with PCIE and OIG policies and procedures.

5. **RESPONSIBILITIES**

A. The Inspector General (IG) and Deputy IG are responsible for overseeing the development and implementation of policies and procedures for the OIG Inspection Program.

B. The Assistant Inspector General for OISI is responsible for:

(1) Establishing procedures for and managing the inspection process;

(2) Selecting the Team Leader to conduct office inspections;

(3) Coordinating with the various OIG components to obtain information and data required during the inspection process; and

(4) Providing the IG and Deputy IG, AIG of the inspected office, regional manager and/or office director inspected and any other Headquarter components that need to be notified with a written report concerning the overall effectiveness and efficiency of the inspection site.

C. Assistant Inspectors General are responsible for:

(1) The overall management and accountability for areas reviewed by the inspection team;

(2) Establishing procedures for managing operations of their respective managers;

(3) Assuring the conformance of their managers with the overall inspection process; and

(4) Responding to recommendations and/or issues addressed in the inspection report.

D. Regional Inspectors General for Audit, Special Agents-In-Charge, Office Directors, Headquarters Managers, and field office managers, as appropriate, are responsible for:

(1) Ensuring that policies and procedures are followed as established by the OIG and DOL guidelines;

(2) Cooperating fully with requests from the inspection team; and

(3) Recommending to the inspection team those areas that require review and/or changes in Headquarters/ National Office policies and procedures.

E. Program Manager of OISI is responsible for all administrative duties for the inspection. This includes sending inspection checklists, maintaining folders, reviewing and gathering information, receiving requests for data, and any other duties required by the inspection team.

F. Inspection Team Leader is responsible for supervising the inspection process at the time of the inspection.

6. **PROCEDURES**

A. PREPARATION FOR AN OFFICE INSPECTION

(1) The Assistant Inspector General for OISI prepares an inspection schedule and selects an inspection team leader. The team leader is then responsible for the inspection.

(2) The team leader selects members of the inspection team.

(3)The inspection notification is sent to the appropriate AIG and the office manager at the inspection site. The notification contains information about the upcoming inspection: the dates of inspection; the names of the team members; and advises that the inspection checklists will be forwarded.

(4)The inspection checklists are forwarded to the office manager. The office manager is required to respond to each inspection checklist question and return responses within two weeks after receipt. The office manager should reference self-inspection information and verifications completed within one year of the scheduled inspection. A member of the inspection team will also contact the office manager during this period to:

(a)Confirm the dates of inspections;

(b)Discuss the Inspection Checklists and self-inspection;

(c)Discuss employee interviews, liaison contacts and appointments;

(d) Set the date for responses to the Inspection Checklists, if an extension is needed; and

(e) Request a point of contact for each section of the Inspection Checklist.

(5) OISI obtains information and data to be used during the office inspection process from Headquarters offices. This information consists of inspection areas from the managerial, administrative and operational checklists (see Section 6B below).

(6) Upon receipt of the office response, the team leader reviews the office response and data from various Headquarter components. Team members are assigned specific area(s) for review. The checklists are distributed along with all relevant materials.

(7) Before the inspection, the team leader will have a preinspection meeting to:

(a) Confirm that team members understand their assigned areas of responsibility;

- (b) Confirm itinerary; and
- (c) Discuss any special problems or concerns unique to the inspection site.

B. CONDUCTING THE INSPECTION

Upon arrival at the inspection site, the inspection team will meet with the office manager to discuss the inspection.

Office inspections involve three primary components:

(1) <u>Confidential Interviews</u> - Normally, confidential interviews of employees are conducted as early in the inspection process as possible. The primary objective of the confidential interview is to provide the employee an opportunity to discuss any problems of a confidential nature and/or special requests the employee may have. If the employee requests that some action be taken as a result of his/her comments, the inspector will advise the employee that complete confidentiality cannot be guaranteed, especially if the employee has been the only one to surface that issue.

An employee who believes he/she requires complete confidentially may use the OIG Anonymous Email System to report concerns. The OIG's Ombudsman is the recipient of the communications and will attempt to address the concerns but cannot respond back or ask questions to clarify specific points. Employees may also utilize the OIG Ombudsman Program to report their concerns or issues. The Ombudsman will listen to the individual's concerns, review them, and advise the individual of potential options available. The Ombudsman, using personal judgment, will facilitate resolution of the concern or conflict through appropriate means.

During the inspection, the team will attempt to interview all employees. If this is not possible, a representative number of employees will be interviewed to provide a good cross-section of the morale in the office. Prior to the interview, the inspection team will obtain a copy of the personnel roster for the region being inspected, disciplinary problems or employee integrity investigations which occurred since the last inspection, and any reports that will aid in the assessment of office morale.

During the interview, the team will review two inspection checklists with the employee:

(a) The Employee Interview Checklist provides possible topics for discussion. However, the interviewer uses some judgment regarding which topics are discussed and at what length. This depends on such factors as employee positions, employee experience, time-in-service, etc. New employees or employees participating in their first inspection are briefed on the inspection process. This briefing emphasizes the inspection process as a positive, constructive process designed to improve the efficiency and work atmosphere of the operational unit being inspected and the OIG as a whole.

Information of a serious nature or out of the ordinary is immediately brought to the attention of the team leader. All employees are prompted to provide any ideas for improvement in OIG. (b) The Accountable Property Checklist is used to check items that each employee is required to carry or have available during working hours. The items that an employee is required to have available vary from one OIG component to another. For example, a special agent is required to have credentials, badge, weapon, handcuffs, etc.

However, an auditor may only have credentials, telephone calling card and travel credit card. Employees must bring the items they are required to carry or have available during the working hours to the confidential interview. The interviewer will record the identifying numbers and compare them with the respective OIG component's accountable property listing.

(2) <u>Liaison Contacts</u> – Contacts with officials in agencies and organizations inside and outside DOL will vary depending on the operational unit being inspected. The purpose of interviews with outside agency officials is to assess the effectiveness of the office's working relationships with others and to express, on behalf of the IG, the OIG's gratitude for assistance provided by the official/agency being contacted.

As a matter of course, liaison contacts can go beyond the head of the agency to include contacts that work directly with OIG. The inspection team will determine which contacts to pursue.

(a) Law Enforcement – Contacts with officials/agencies of a law enforcement nature will include discussions on:

(i) Adequacy of Cooperation and Sharing of Intelligence;

(ii) Adequacy of Communications;

(iii) Misunderstandings or unusual incidents; and

(iv) Support of investigative matters under OIG's jurisdiction including offers of our assistance to local agencies on joint investigations.

(b) Prosecutors – Contacts with the U.S., State, or Local Attorney's office will include discussions on:

- (i) Adequacy of reports;
- (ii) Quality of investigations;
- (iii) Quality of testimony;
- (iv) Communications;
- (v) Investigative jurisdiction problems;
- (vi) Trial preparation and assistance.

(c) DOL Officials – Contacts with DOL officials should include discussions involving:

- (i) Adequacy of Communications;
- (ii) Misunderstandings or unusual incidents;
- (iii) Cooperation issues between OIG and the agency officials;
- (iv) Adequacy of administrative reports; and
- (v) Support in matters under our jurisdiction.

(d) Non-DOL Officials – Contacts with non-DOL officials (contractors; other Federal and State officials)

- (i) Communications issues;
- (ii) Misunderstandings or unusual incidents;
- (iii) Cooperation issues between OIG and officials;
- (iv) Adequacy of work product from OIG; and
- (v) Support in matters under our jurisdiction.

(3) <u>Review of Management, Administration, and Operations</u> – These reviews are accomplished primarily through the use of the inspection checklists. The checklists are separated into three major categories: Management, Administration and Operations. However, the lists are guidelines and are not restricted to the scope and direction of the inspection. (a) The management category serves as an overview of the entire office. In reviewing the management of an office, the inspection team uses information from or review of the following areas:

(i) Confidential Interviews

(ii) Liaison Contacts

(iii) Employee Management (recruitment, diversity, performance and award activities)

(iv) Training Management (personal training and required training)

(v) Fiscal Operations (strategic planning and confidential funds)

(b) The administration checklist serves as a guideline for determining whether or not the office is fulfilling its administrative obligations. The scope of this checklist includes the following areas:

(i) Firearms requirements

(ii) Travel Management

(iii) Vehicle Management (cars, accidents,

maintenance expenses and repairs)

(iv) Time Management (time entries, leave slips and OIG Form 113/AIRS timesheets)

(v) Property Management (office and technical equipment, accountable property, and OIG Credentials)

(vi) Procurement (purchase and credit card management)

(vii) File Management

(viii) Safety (physical requirements, office safety, evacuation and emergency programs, building procedures, FECA claims).

(c) The operational inspection checklist is used to review investigative and audit activities to ensure that they are conducted in accordance with PCIE, investigative and audit standards, and OIG policies and procedures. (i) Investigations. The inspection team reviews closed investigations only. The scope of this section involves the following areas:

- OIG Notification Requirements;
- Consensual Monitoring;
- Undercover Operations;
- Informants and Confidential Sources;
- Grand Jury 6(e) Material;
- Evidence Management; and

- Records Management (case file retention and destruction).

(ii) Audits. The inspection team reviews closed audits or evaluations only. The scope of this section involves the following areas:

- Follow-up on the findings and corrective actions from the latest peer review report, if applicable;

- Workpaper and Privacy Act information security; and

- Records Management (workpaper retention and destruction).

C. POST INSPECTION PROCESS

At the conclusion of an office inspection, the team will meet with the office manager to discuss findings during the inspection. At this time, the office manager is given an opportunity to discuss and comment on the findings with the inspection team.

Upon return to the office, a report is written to summarize the findings of the inspection team and to detail accomplishments and areas in need of improvement. The office manager's comments will also be included in this report.

The report is then forwarded to the Assistant Inspector General for OISI for review and approval. Once the report has been approved, copies are distributed to:

(1) The Inspector General;

(2) The Deputy Inspector General;

(3) The AIG of the inspected office;

(4) The regional manager and/or office director inspected; and

(5) Any other Headquarter components that need to be notified.

The AIG of the inspected office and, if necessary, the AIG who manages the area reviewed will provide written comments to the inspection team on the recommendations and findings included in the report.

7. EFFECTIVE DATE AND CANCELLATON

This IGD is effective immediately and remains in effect until superseded or rescinded. This revision supersedes IGD 3-200, Internal OIG Review Program, dated March 22, 1996, in its entirety.

OIG Manual

U.S. Department of Labor Office of Inspector General



Transmittal Sheet

Date: SEP 2 4 2003

IGD 3-600-2

MANAGEMENT OPERATIONS: Weekly Significant Activities Reports

This Inspector General Directive (IGD) provides the instructions on preparing correspondence.

This directive rescinds IGD 3-600-1, Biweekly Significant Activities Reports, dated 8/19/83.

jordon S. Heddell

GORDON S. HEDDELI Inspector General

INSTRUCTIONS: Insert this IGD in Part 3, Management Operations, of the OIG Manual. Remove IGD 3-600-1, Biweekly Significant Activities Reports, dated 8/19/83.

OIG Manual	U.S. Department of Labor Office of Inspector General	COE INSPECTOR CELLER
Inspector General	Chapter: 3 – Management Operations	A A A A A A A A A A A A A A A A A A A
Directive	Title: WEEKLY SIGNIFICANT ACTIVITIES REPORTS	
Number: 3-600-2	Date:	

1. PURPOSE

This directive sets forth the procedures for preparing a weekly significant activities report to the Inspector General. These reports are important information sources apprising the Inspector General of significant activities.

This directive rescinds IGD 3-600-1, Biweekly Significant Activities Reports, dated 8/19/83.

2. SCOPE

This directive applies to all Assistant Inspectors General

3. POLICY

Every week, each component shall prepare a significant activities report, which is due to the front office by Monday noon . This report should be succinct in nature and should contain the following sections:

• <u>Program Issues</u>: Include the top 3 to 5 issues (what, where, when, how, and any OIG impact).

- <u>Follow-up on Prior Significant/Sensitive Issues</u>: Include disputes with Departmental staff on program issues; special investigations, employee relations, etc
- <u>Administrative/Operational Issues</u>: Include information on budget, personnel, IT, etc.
- <u>Government/Agency-wide Issues of Interest</u>: Include information on law enforcement, Audit, Legal, Congress, OPM, OMB, etc.
- <u>Individual Employee News or Concerns</u>: Include information on births, illnesses, deaths, departures, retirements, outside awards, etc.

4. EFFECTIVE DATES AND CANCELLATION

This directive rescinds IGD 3-600-1, Biweekly Significant Activities Reports, dated 8/19/83.

This Directive is effective immediately and will remain in effect until canceled or superseded. It requires implementation of action items, and contains information of a continuing nature.

OIG Manual

U.S. Department of Labor Office of Inspector General



Transmittal Sheet

Date: FEB 0 6 2018

IGD 4-511

PERSONNEL MANAGEMENT: Position Management- Organizational Review

This Directive establishes policies and requirements, and assigns responsibilities within the Department of Labor's Office of Inspector General (OIG) affecting organizational and positon changes.

This Directive rescinds Management Notice MN 3-2000-1, dated January 17, 1986.

This Directive is effective immediately and will remain in effect until canceled or superseded. It requires implementation of action items, and contains information of a continuing nature.

SCOTT S. DAHL Inspector General

OIG Manual	U.S. Department of Labor Office of Inspector General	OF INSPECTOR CE	
Inspector General	Chapter: 4– Personnel Management		
Directive	Title: Position Management- Organizational Review		

Number: 4-511

Date: February 6, 2018

1. PURPOSE

This Directive sets forth the OIG's policy concerning position management and the responsibilities and requirements for processing requests for organizational changes and associated position changes for approval by the Inspector General (IG) prior to implementation.

2. <u>SCOPE</u>

This Directive applies to all OIG Management. Specifically, the scope of this Directive applies to all positions in the OIG subject to the Classification Act of 1949 except those positions excluded from the General Schedule classification system by application of the criteria stated in title 5, United States Code (U.S.C.) Chapter 51 or as specifically determined by law.

3. BACKGROUND

This Directive implements and supplements the policy for position management promulgated under DPR 511, Position Classification.

The OIG Position Management Program is a systematic approach for determining the number of positions needed, the skill and knowledge requirements of those positions, and the grouping of duties and responsibilities among positions. The process is focused on translating the organization's goals into major tasks and organizational elements, sub-tasks and sub-elements, and ultimately, into duties of individual positons.

4. POLICY

It is the OIG's policy that all organizational changes are requested and approved through a formal process to ensure that such changes are adequately documented, best serve mission needs, and appropriately balance productivity, economy, efficiency, and sound position management concerns while meeting all Government requirements. The OIG utilizes a classification system that is intended to implement the principle of equal pay for substantially equal work; recognize that variations in ranges of basic pay for different employees should be proportionate to substantial differences in the difficulty, responsibility, and qualification requirements of the work performed; and facilitate human resources administration in areas such as compensation, recruitment, selection, promotion, and training of employees. Position Descriptions (PDs) are the official record of the major duties and responsibilities assigned to a particular position by management.

5. <u>RESPONSIBILITIES</u>

- A. <u>Inspector General (IG)</u> approves or disapproves the organizational management change.
- B. <u>The Deputy Inspector General (DIG)</u> reviews and approves or disapproves the organizational management change and submits all proposed changes to the IG. Additionally, serves as the proposing official for organizational changes associated with the Office of Special Investigations.
- C. <u>Assistant Inspector General for Management and Policy (AIG-MP)</u> reviews, approves or disapproves, and submits all proposed changes to the Deputy Inspector General. Additionally, the AIG-MP is responsible for the direction and administration of the activities under this IGD.
- D. <u>Assistant Inspectors General (AIGs) and Counsel to the IG</u> ensure proposed organizational change and position changes serve mission needs; provide an optimum balance among productivity, economy, efficiency, and sound position management; contribute to a continuing increase in employee productivity through increased quality and/or quantity of work or reduced personnel and fiscal resource consumption; and avoid: unwarranted grade escalation, increases in operating costs, reductions in the utilization of essential skills, establishment of unproductive layers of supervision (i.e., span of control), or dilution of position duties and responsibilities.
- E. <u>Supervisors</u> justify position requirements during the budget development process; control personnel actions to ensure adherence to allocated positions ceilings, or other limitations, and efficient use of staff; and develop organization charts, mission, and function statements, PDs, and staffing patterns for each organizational entity. Additionally, Supervisors are responsible for assigning work and ensuring that PDs of employees they supervise are current and accurate.

When designing an organizational and position structure, managers should take into consideration span of control and supervisory ratios. Supervisor to non-supervisor ratio should strive to meet or exceed the Department's desirable objective of 1:8, but not less than 1:3; furthermore, the number of workers supervised by one individual should be extended as far as is feasible in any given circumstance.

F. <u>The Division of Human Resources Management (DHRM)</u> in the Office of Management and Policy (OMAP) ensures compliance with this directive and policies applicable to the aim of proper balance among organizational structure, mission and function statements, and effective and economical use of human resources. DHRM also has responsibility for ensuring that organizational changes comply with prevailing human resources regulations.

DHRM staff will review the proposed organization and position structure for compliance with the Department's organizational and position management policies and supervisory ratio objectives, as well as applicable classification standards; determine its impact on other segments of the organization and position structure; identify any duplication or overlap of functions; verify availability and grade level of work in affected organization(s); and classify any new or revised PDs. DHRM will communicate its determinations to the cognizant AIG/Office Heads.

- G. <u>The Division of Budget</u> in OMAP evaluates the financial impact of any proposed organizational change.
- H. <u>Employees</u> are responsible for bringing to the attention of their supervisor any continuing differences between their work assignments and the PD, which substantially affect the accuracy of the official PD.

6. <u>REQUIREMENTS</u>

Requests for organizational changes and associated position changes will be submitted to the IG and DIG through the Assistant Inspector General for Management and Policy. The requesting AIG or Office Head and must include the following information in the request:

- A. <u>Statement of Justification</u>. This should succinctly and completely explain the necessity for the change and project the benefits resulting from it.
- B. <u>Organization Charts (Current and Proposed)</u>. These should show each organizational level from the office to the branch level.
- C. <u>Mission and Function Statements (Current and Proposed)</u>. These should be supplied for each organizational level, from the office to branch level.
- D. <u>Copies of PDs (Current and Proposed)</u>. These should be supplied for each position that is affected by the proposed change/reorganization.
- E. <u>Staffing Pattern.</u> This should show a comparison between the current and proposed structure including the following information: position title, series/grade, current number of staff, proposed number of staff, and impact of changes.
- F. <u>Budgetary Impact.</u> Indicate how the change would affect the component's budgeted positons (i.e., if additional positions are proposed, where the funds will come from to cover the cost of additional staff).

7. EFFECTIVE DATES AND CANCELLATION

This Directive is effective immediately and will remain in effect until canceled or superseded.



OIG Manual

U.S. Department of Labor Office of Inspector General

Transmittal Sheet

Date: September 29, 2010

IGD 4-702

PERSONNEL MANAGEMENT: Outside Employment and Activities of OIG Employees

This Directive establishes policies and procedures, and assigns responsibilities within the Department of Labor's Office of Inspector General (OIG) concerning outside employment activities of OIG employees.

This Directive is effective immediately and will remain in effect until canceled or superseded. It requires implementation of action items, and contains information of a continuing nature.

Vaniel R. Petrole

Daniel R. Petrole Acting Inspector General

OIG ManualU.S. Department of Labor
Office of Inspector GeneralInspector GeneralChapter: 4 – Personnel
ManagementDirectiveTitle: Outside Employment and Activities of
OIG Employees

Number: 4-702	Date: S	e

Date: September 29, 2010

1. PURPOSE

This Directive establishes policies and procedures, and assigns responsibilities within the Department of Labor's Office of Inspector General (OIG) concerning outside employment activities of OIG employees

2. SCOPE

This Directive applies to all DOL OIG employees who engage in employment or other covered activities outside of the OIG.

3. BACKGROUND

For purposes of this Directive, outside employment includes self-employment, consulting activities, and paid and unpaid volunteer activities that could be considered outside employment.

4. POLICY

- a. OIG employees are required to adhere to all applicable rules and ethics regulations governing outside employment.
- b. Pursuant to 5 C.F.R. 5201.104, a DOL OIG employee is required to obtain written approval before engaging in any outside employment. Outside employment includes any form of employment, business relationship, or activity involving the provision of personal services, whether paid or unpaid.
- c. Any outside employment activity which is approved, may not be conducted on official government time or using official government equipment, including, but not limited to, government issued or leased computers, telephones, office equipment, Blackberry's or other PDAs, or motor vehicles. The activity may not, in <u>any way</u>, interfere or affect the performance of government duties, to include travel and an employee's enforcement availability.

- Any leave requested, in order to perform outside employment activity, must be independently approved by the employee's supervisor; approval for the activity does not automatically entitle the employee to take leave. In addition, the approval of leave is always within the discretion of the supervisor, and he/she can insist that the employee be on the job based upon the requirements of the office at any given time.
- e. Employees cannot directly or indirectly represent that their OIG position is in any way related to their outside employment activity.
- f. Employees should direct any questions regarding outside employment activities to the Counsel to the Inspector General.
- g. Employees may not grieve or appeal the AIG's disapproval of their outside employment.
- h. Employees may not, directly or indirectly, engage in outside employment which may conflict with the best interests of the OIG and/or may be perceived by members of the public as a conflict of interest or otherwise discredits public service.

5. RESPONSIBILITIES AND APPROVAL PROCESS

Approval Process

- a. All OIG Employees shall:
 - i. Complete the approval request form (an electronically fillable version which is posted on the DOL-OIG intranet) before outside employment begins. The OIG Employees will submit the approval form to their supervisor for approval.
- b. The Supervisors shall:
 - i. Submit the approval form to the Counsel to the IG.
 - Counsel to the Inspector General.
- c. The Counsel to the IG shall:
 - i. Review the request and provide a recommendation to the Assistant Inspector General (AIG) for the component which employs the requesting employee.
- d. The AIGs shall:
 - i. Review the Request for Approval of Outside Employment, consider the recommendation of the Counsel to the IG, make a final decision, and then transmit the decision to the employee. The Inspector General has designated approval authority to the respective AIGs.

Responsibilities

- a. All the OIG Employees shall:
 - i. Inform the Counsel to the Inspector General of any changes (e.g., duties, employer, schedule) in the approved outside employment activity. Changes include, but are not limited to, changes in position, hours, type of work, and termination of employment.
 - The Supervisors shall:
 - i. Monitor the employee's outside employment activity to ensure that it does not affect the employee's productivity and/or availability as an OIG employee.

ii. Monitor the employee's outside employment activity to ensure that it does not significantly alter core hours/office hours at the OIG.

Request for Approval of Outside Employment

Name of OIG Employee:_____

Position/Job Title:_____

OIG Office:_____

Name and Address of Outside Employer:

Description of Proposed Outside Employment:

Proposed Dates of Outside Employment: Dates:

Additional Comments:

I hereby request approval for outside employment activities, and I hereby certify that:

* The outside employment will not depend in any way on nonpublic information as defined at 5 CFR 2635.703 (b);

* No official duty time of government property, resources, or facilities not available to the general public will be used in connection with the outside employment:

* I have read and I am familiar with the Standards of Ethical conduct for Employees of the Executive Branch (5 CFR part 2635), including H. ("Outside Activities"), and the department of Labor's supplement standards of ethical conduct (5 CFR section 5201.104).

Signature of Employee

Signature of Supervisor



OIG Manual

U.S. Department of Labor Office of Inspector General

Transmittal Sheet

Date:

'JAN 2 2 2016

IGD 5-500

INFORMATION: MEDIA RELATIONS

This directive establishes policies and procedures, and assigns responsibilities within the Department of Labor's Office of Inspector General (OIG) concerning media relations and the role of the Office of Congressional and Public Relations (OCPR).

This directive is effective immediately and will remain in effect until canceled or superseded.

This directive replaces IGD 5-500-1, Inquiries Received from the Media, dated July 12, 1983.

Scott S. Dahl Inspector General

OIG Manual

U.S. Department of Labor Office of Inspector General



Inspector General

Chapter: 5 – Information

Directive

Title: Media Relations

Number: 5-500

Date:

1. PURPOSE

This directive establishes policies and procedures, and assigns responsibilities within the U.S. Department of Labor's Office of Inspector General (OIG) concerning media relations and the role of the Office of Congressional and Public Relations (OCPR).

2. SCOPE

This directive applies to all OIG components and employees.

3. POLICY

The Inspector General Act requires IG offices to keep stakeholders timely and properly informed about its work. Having an effective media relations program is important because it allows the OIG to inform external stakeholders about OIG key activities and accomplishments, highlight the OIG's contributions to the improvement of DOL programs and operations, and communicate the results of OIG audits and investigations.

4. ROLES AND RESPONSIBILITIES

1) The Director of OCPR (or designee) shall:

- a) Serve as the designated Public Affairs Officer for the OIG, reporting directly to the Deputy Inspector General (DIG);
- b) Keep the Inspector General (IG) and DIG informed of media inquiries regarding the OIG;
- c) Advise the IG and DIG with respect to responses to media inquiries;
- d) Serve as the OIG point of contact and liaison for all matters involving contact with the news media;
- e) Serve as the OIG point of contact for DOL's Office of Public Affairs (OPA);

- f) Serve as the liaison between the Offices of the United States Attorneys' (USAO) and the OIG's Offices of Labor Racketeering and Fraud Investigations (OLRFI) and Special Investigations (OSI) in the issuance of USAO press releases and quotes involving the OIG.
- g) Coordinate and monitor media interviews; and,
- h) Oversee the use of the OIG internet, intranet, and social media as part of the OIG public affairs program.

2) Each OIG component head (e.g. AIGs, Counsel to the IG, OSI Chief) shall:

- a) Coordinate through OCPR all matters involving their component's contact with the news media;
- b) When possible, notify OCPR at least 48 hours in advance of the release of any audits or reports, as well as investigative or criminal justice actions that involve significant issues/cases that may generate media inquiries;
- c) Notify OCPR as soon as possible of any inquiries made by the news media;
- d) Provide OCPR component-level support and input in drafting communication points and answers to possible questions relating to media inquiries;
- e) Assist the Counsel to the IG and the OIG Disclosure Officer as requested to determine whether OIG information proposed for public release should be withheld in accordance with the Freedom of Information Act (FOIA) or the Privacy Act;
- f) Coordinate with the Disclosure Officer whenever there is a question whether information proposed for public release is derived from classified or possibly classified material or from Controlled Unclassified Information (CUI);
- g) Coordinate with OCPR before releasing public information on significant cases/audits;
- h) Ensure component employees compliance with OIG policy and procedures regarding the release of information or comment to the public and the media; and
- i) Ensure internal procedures and guidelines regarding contact with the media are consistent with the guidance contained in this Directive.
- 3) If contacted by the media regarding OIG audits, investigations, or any OIG work, all OIG employees shall:
 - a) Determine what the inquiry is about and take notes. Do not respond to any guestions or make any statements concerning the subject of the inquiry;
 - b) Obtain the media representative's name, media outlet they represent, city where they are located, telephone number, and email contact information;
 - c) Advise that it is the OIG's policy to respond to any media inquiries regarding an OIG audit, OIG Investigation, or any OIG work through the Office of Congressional and Public Relations at Headquarters, and provide them contact information for OCPR;
 - d) Notify the Director of OCPR (or designee), the appropriate supervisor, and Headquarters management of the inquiry via telephone or e-mail; and
 - e) The above guidance applies in all situations, including those where OIG employees are approached by media representatives while conducting field activities, such as arrests, raids, or similar matters.

5. RESPONSE TO MEDIA INQUIRIES

1) OIG Audits:

As a general rule, OIG audit reports should speak for themselves. However, information provided in response to news media requests for clarification or additional information relating to reports must be coordinated by OCPR and approved by the AIG for Audit. In the event the report involves a high-profile issue that may be the subject of media inquiries, the Office of Audit (OA) shall work with OCPR to draft appropriate communication points and a list of anticipated questions with proposed answers. All statements for the record must be submitted by the Director of OCPR to the IG and DIG for approval prior to dissemination to the media.

Information in audit reports which is deemed to be sensitive or proprietary will not be released publicly. Determinations on such matters will be made by the Counsel to the IG and Director of OCPR after consultation with the AIG for Audit and, if necessary, the IG and/or DIG.

2) OIG Investigations:

It is the OIG's policy to not confirm or deny the existence of, or comment upon, on-going investigations, except in those circumstances where the prosecuting office (e.g., U.S. Attorney's Offices or a state or local District Attorney's office) has acknowledged the existence of an investigation and has authorized comments by investigative agencies. It is also the general policy of the OIG to not publicly comment on allegations or ongoing investigations unless and until a public arrest or indictment takes place in a criminal matter. All comments regarding criminal investigations must be coordinated with the prosecuting office and disseminated by OCPR.

In administrative investigations, it is the general policy of the OIG to not publicly comment on allegations or ongoing investigations unless and until a final investigative report is issued and the Department has taken formal administrative action, unless the IG and/or DIG determines it is in the public interest to do so.

All inquiries regarding information of national interest and/or applicable to DOL shall be forwarded to the Director of OCPR, who will coordinate with DOL's OPA as appropriate.

Additionally:

- a) OCPR must be notified of all high-profile cases, particularly those that may develop into a matter of national interest.
- b) For press briefings of national-level or Department-wide interest, OLRFI/OSI employees shall seek authorization to participate from OCPR and OLRFI/OSI management.

- c) In cases having the potential for national media coverage, or where national news outlets or publications contact the OIG, the Director of OCPR (or designee) will take the lead in handling the media.
- d) Responses to media inquiries on criminal investigative programs and/or specific projects or task forces will require consultation with the Counsel to the IG, Director of OCPR, appropriate OIG component head and, if necessary, the IG/DIG.

A. Requests for Quotes:

When requested by a U.S. Attorney's office, District Attorney, or similar entity, the OIG may provide a quote to be included in a press release.

As soon as OLRFI/OSI staff is notified that the prosecuting office plans to issue a press release, they shall notify the Director of OCPR, their OLRFI/OSI supervisor, and other OLRFI/OSI Headquarters-level supervisory personnel as soon as possible and prior to the issuance of any quotes.

Clearance process for post-conviction and civil settlement quotes:

- i. Special Agents in Charge (SACs) or OSI agents will draft and submit a quote to OLRFI/OSI Headquarters and OCPR for review.
- ii. OCPR will forward the quote to IG and DIG for final approval.
- iii. Once approval is obtained, OCPR will coordinate and transmit the quote to the prosecuting office and notify the SAC and OLRFI/OSI Headquarters.
- iv. The following format examples will be used for quotes:

(1) From the Inspector General:

"_____," stated Name, Inspector General, United States Department of Labor.

(2) From a SAC:

"_____," stated Name, Special Agent-in-Charge of the ______ Regional Office of the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations.

Clearance process for pre-conviction quotes:

Department of Justice guidance restricts pre-trial public statements in criminal cases in order to avoid potentially improper influence by the government. See, U.S. Attorneys' Manual, sections 1-7.401, 1-7.500, 1-7.520, 1-7.55, and 28 C.F.R. 50.2. In deference to this clear policy, the OIG will not provide a quote specifically referring to the defendant's conduct for a pre-conviction press release.

If the OIG is expressly requested to provide a pre-conviction quote, and OLRFI determines that a quote is in the best interest of the government, the only approved quote is the following:

"An important mission of the Office of Inspector General is to investigate allegations relating to... **[insert related mission-specific language but not referencing the allegations, facts, or names]**. We will continue to work with our law enforcement partners to investigate these types of allegations," stated Name, Special Agent-in-Charge of the ______ Regional Office of the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations.

B. Press Conferences:

OCPR and OLRFI/OSI Headquarters should be notified in advance regarding possible participation in press conferences. USAOs often hold joint press conferences that include representatives of participating agencies when a high-profile case is resolved, an indictment is issued, an arrest is made, or a significant sentence or fine is handed down. In general, the SAC for the pertinent regional office will represent the OIG at these events.

As soon as OLRFI/OSI personnel are notified that a joint press conference will be held in which they intend to participate, they shall notify the Director of OCPR and OLRFI/OSI Headquarters. Notification should include the date, time and location of the press conference, along with a brief description of the case. Whenever possible, OCPR shall be given a 48hour advance notice.

3) Requests for Records:

All requests by news media representatives for OIG records should be forwarded to the Director of OCPR. Records that are already publicly available may be released by the Director of OCPR or by OIG employees with the concurrence of the Director of OCPR.

For records that are not already publicly available, news media representatives shall be informed by the Director of OCPR that a FOIA request should be submitted to the OIG Disclosure Officer. The Disclosure Officer shall make reasonable efforts, while complying with FOIA policies and guidance, to expeditiously provide those records which are releasable, to assist in providing timely information to the public, through the media, regarding OIG activities.

4) Interviews:

Media requests for interviews concerning audits or investigations, or other OIG matters, shall be approved by the IG or DIG in consultation with the Director of OCPR and the OIG component head. In some circumstances, where comment from a subject-matter-expert is required (such as the case agent on an OIG investigation or the lead auditor on a highly sensitive special project), personnel designated by the appropriate OIG component head may be interviewed with an OCPR representative present or monitoring the interview. With the concurrence of their supervisor, field staff must notify OCPR and the appropriate Headquarters-level supervisory personnel regarding any requests for interviews at least 48 hours in advance and must receive approval from both before proceeding with the interview.

5) Requests Received via Social Media:

Given the public nature of social media interactions, it is the policy of the OIG to not engage media representatives via social media (i.e. Twitter). Any media requests received via social media shall be redirected to OCPR's main email and telephone lines.



OIG Manual

U.S. Department of Labor Office of Inspector General

Transmittal Sheet

Date: JAN 1 3 2004

IGD 8-200

AUDIT AND INVESTIGATION: Independence Committee

This IG Directive creates and describes the function of the Audit Independence Committee and rescinds IGD 3-1600-1, Participation in Regional Executive Committees, dated January 17, 1986, in its entirety.

GORDON S. HED

Inspector General

INSTRUCTIONS: Insert this IGD in Part 8, Audit and Investigation of the OIG Manual and remove IGD 3-1600-1, Participation in Regional Executive Committees, dated January 17, 1986, in its entirety.

OIG Manual

U.S. Department of Labor Office of Inspector General

Inspector General

Chapter: 8 - Audit and Investigation



Directive

Title: INDEPENDENCE COMMITTEE

Number: 8-200

Date: January 13, 2004

1. PURPOSE

This IG Directive creates and describes the function of the Independence Committee.

2. SCOPE

This Directive applies to all employees and contractors of the Office of Inspector General.

3. BACKGROUND

On January 25, 2002, the General Accounting Office (GAO) issued an amendment to <u>Government Auditing Standards (1994 revision)</u>, <u>Amendment No. 3</u>, <u>Independence</u>. GAO recognizes that audit organizations, such as OIG, are asked to perform a range of services for the Department, including its grantees and contractors, that are not specifically audit, evaluation or investigative in nature. However, in certain circumstances, it is not appropriate for OIG to perform audits, evaluations or investigations and at the same time, the requested services for the same organization. In order to maintain a high degree of integrity, objectivity, and independence for audits, evaluations and investigations of government entities, GAO developed the following two overarching principles for providing services:

- OIG staff should not perform DOL management functions or make management decisions; and
- OIG staff should not audit, evaluate or investigate their own work.

When DOL management, contractors and grantees request services, other than audit, evaluation or investigative activities, OIG, through the Independence Committee, will have to make a choice as to which of these services OIG will provide. This IG Directive creates and describes the function of the Independence Committee.

4. POLICY

OIG employees should avoid situations that could lead reasonable third parties with knowledge of the relevant facts and circumstances to conclude that the auditor is not able to maintain independence and, thus, is not capable of exercising objective and impartial judgment on all issues associated with conducting and reporting on the work.

OIG employees will refer matters that are not readily apparent as to whether they would violate the above overarching principles to the OIG Independence Committee.

5. **RESPONSIBILITIES**

A. <u>Deputy Inspector General (DIG)</u> – The DIG will chair the Independence Committee.

B. <u>Assistant Inspectors General (AIG)</u> – The AIGs will convene the Independence Committee when services are requested by DOL management, contractors and grantees that are not specifically audit, evaluation or investigative in nature and may impair or could appear to impair OIG's independence to perform current, future or potential audits, evaluations and investigations and when the requests require some deliberation to determine whether they would violate the overarching principles.

C. <u>Regional Inspector Generals (RIG), Special Agent-In-</u> <u>Charge (SAC) and Office Directors (OD)</u> – RIGs, SACs, and ODs will evaluate requests by DOL management, contractors and grantees that are not specifically audit, evaluation or investigative in nature and determine if the requests may impair or could appear to impair OIG's Independence. RIGs or ODs should notify their AIG when a decision needs to be made by the Independence Committee.

D. <u>Employees and Contractors</u> – All employees and contractors should evaluate requests by DOL management, grantees and contractors for services that are not specifically audit, evaluation or investigative in nature and determine if the requests may impair or could appear to impair OIG's Independence. Employees should notify through their chain of command their RIGs, SACs or ODs when a decision needs to be made by the Independence Committee.

6. INDEPENDENCE COMMITTEE

The committee will be made up of the DIG and AIGs. The committee will review requests for services that are not specifically audit, evaluation or investigative in nature and that may impair OIG's Independence and determine if the requested services will be provided.

The independence committee will:

A. Meet to consider issues of independence (meetings will be scheduled on an as needed basis, based on specific independence questions).

B. Use Generally Accepted Government Auditing Standards as the basis for independence issues.

C. Respond to each request for guidance in a timely manner in order to allow the requesting party the ability to timely continue or complete the project in question.

D. Review and approve all OIG memoranda of understanding with the Department related to non-audit services to be performed by the OIG.

E. Consider potential conflicts with the work performed by the Independent Public Accountants (IPA) under contract with the OIG with any departmental requests related to the use of those IPAs.

7. PROCEDURES

All OIG employees should evaluate requests by DOL management, contractors and grantees for services, other than audit, evaluation or investigative activities to determine if the requests may impair OIG's independence.

Services that may Impair OIG's Independence

By their nature certain services impair the OIG's ability to meet the principles of independence. For example, if the OIG was asked to be responsible for designing, developing, and/or installing the entity's accounting system or is operating the system and then performed a financial statement audit of the entity, the OIG would clearly be in violation of the independence standard.

Likewise, if the OIG were asked to develop an entity's performance measurement system, the OIG would not be deemed independent if it was asked to conduct a performance audit to evaluate whether the system was adequate.

In both of these examples, the audit organization could decide to perform the service but would then not be permitted to perform the subsequent audit because it would be in violation of GAO's independence standard and impairs OIG's capability to audit, evaluate or investigate impartially. In these cases, the OIG should communicate to management of the audited entity that the audit organization would not be able to perform the service.

If an employee believes a DOL management, contractor or grantee request may affect OIG independence, the employee should notify, through his/her chain of command the RIG, SAC or OD that a decision needs to be made on whether to perform the service. RIGs, SACs and ODs will evaluate the requested service and determine if the requests may impair OIG's independence.

If it is not readily apparent as to whether the request would violate the overarching principles, the RIGs, SACs or ODs should notify their AIG that a decision needs to be made by the Independence Committee. The responsible AIG will convene the Independence Committee to discuss the request and decide if the request impairs OIG independence.

Documentation should be prepared and maintained of the request, decision and justification.

Services that do not Impair OIG's Independence

OIG employees and contractors may participate on committees or task forces in a purely advisory capacity to advise DOL management, contractors and grantees on issues related to the knowledge and skills without impairing their independence. However, OIG employees should not make management decisions or perform management functions.

OIG employees and contractors can provide routine advice to DOL management, contractors and grantees to assist them in activities such as establishing internal controls or implementing audit recommendations, can answer technical questions, and/or provide training.

OIG employees and contractors may also provide tools and methodologies, such as best practice guides, benchmarking studies, and internal control assessment methodologies that can be used by management. OIG employees can also participate and cooperate with the Department's <u>Regional Executive Committees</u> (REC) in efforts to improve regional coordination and enhance productivity. However, such participation will be limited to general, non-office holding membership. OIG employees should not vote on matters that could have the effect of committing a DOL program agency to a particular course of action in carrying out its mission.

Since in each of the above examples the decision to follow OIG's advice remains with management, OIG independence is not impaired. By their very nature, these are routine activities that would not require a decision from the Independence Committee.

8. EFFECTIVE DATES AND CANCELLATION

This Directive is effective immediately and will remain in effect until canceled or superseded. It requires implementation of action items, and contains information of a continuing nature.

This IGD rescinds IGD 3-1600-1, Participation in Regional Executive Committees, dated January 17, 1986, in its entirety.