

NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS

CLOSEOUT MEMORANDUM

TO: AIGI

File Number: I92030008

Date: 09 March 2002

Subject: Closeout Memo

Page 1 of 1

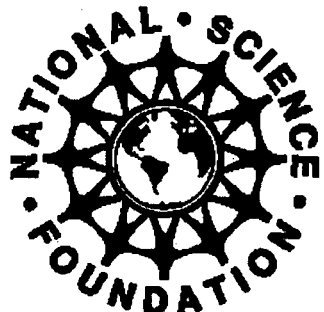
There was no closeout written at the time this case was closed. The following information was extracted from the file in conformance with standard closeout documents.

Our office was informed that the subject¹ was alleged to have committed minor misrepresentations and reckless and intentional false statements. These allegations were reported to the affected NSF division² and the subjects were sanctioned.

Accordingly this case is closed.

[REDACTED]

Name:	Prepared by:	Cleared by:		
	Agent:	Attorney:	Supervisor:	AIGI
Signature & date:				



NATIONAL SCIENCE FOUNDATION
1800 G STREET, N.W.
WASHINGTON, D.C. 20550



OFFICE OF
INSPECTOR GENERAL

REPORT OF INVESTIGATION

OIG Case Number I92030008

This document is loaned to you FOR OFFICIAL USE ONLY. It remains the property of the Office of Inspector General. It may not be reproduced. It may be disclosed outside of NSF only by the Inspector General, pursuant to the Freedom of Information and Privacy Acts, 5 U.S.C. §§ 552, 552a.

ABUSE OF CAR POOL PROGRAM **BY NSF EMPLOYEES**

(Investigation Report - Case No. I92030008)

Basis for Investigation

In response to allegations of abuse, the Office of Inspector General (OIG) conducted an audit of the NSF car pool parking permit program in 1990. The audit uncovered systemic weaknesses and made recommendations for improvement, including amending application forms to warn NSF employees about submitting false information.

In 1992, OIG received new allegations of abuse in the NSF car pool parking permit program. Allegedly seven NSF employees had submitted fraudulent car pool applications listing the names of false riders. These seven employees allegedly were not participants in car pools, but were driving to work alone.

Because of these new allegations, we began an investigation of these seven car pool applications, under the authority of the Inspector General Act of 1978, as amended (5 U.S.C. app.). We later expanded this investigation to include reviewing 70 car pool applications.

Background

NSF Parking Permit Program

NSF employees who commute to work by car pool are entitled to subsidized parking spaces. NSF subsidizes half of the monthly parking cost for each car pool awarded a parking permit. NSF subsidizes 162 car pools at a cost of over \$150,000 per year. According to NSF Manual 1, Chapter V, Subchapter 200, "The

Foundation encourages the optimum use of automobile parking spaces through the formation of car pools."

A regular (type "C") car pool membership must have at least two full-time participants.¹ At least one of the participants in the car pool must be a full-time NSF employee, who is designated as the principal driver of the car pool. The car pool must operate on a regular basis with participants riding to and from work daily, except for leave, travel, and other temporary absences. Permit holders park in spaces located in or near government-leased buildings. Permit holders must observe the rules established by the parking facility operator and must assume responsibility for resolving parking problems.

Interested employees submit applications for parking permits every 6 months. NSF's Division of Administrative Services (DAS), which administers the parking program, awards permits semiannually in March and September. DAS issues bulletins to all employees announcing the upcoming permit competition and stating competition rules. In order to apply for a car pool parking permit, an employee must complete NSF Form 566, "APPLICATION FOR PARKING PERMIT," and submit it to DAS. The application form requires that car pool participants record their employee number, riding frequency, and Service Computation Date (SCD)², if this information applies to them. Car pool participants are also required to sign their names on the form to certify the accuracy of the recorded information. Although each participant is responsible for the accuracy of the information recorded about them, the principal driver of the car pool is responsible for the accuracy of all information recorded on the form. Form 566 cautions participants about submitting false information by stating the following: "Warning: Employees who submit fraudulent applications will have parking privileges revoked for a minimum of six months."³ This warning is in accordance with the Federal Property and Management Regulations, Section 101-20.117-4, which prescribes that parking privileges in a federal facility must be revoked for a minimum of 6 months for misrepresentation of car pool membership,

¹NSF parking spaces are available for handicapped employees, but this priority allocation requires certification from NSF's Director of Health Services. Designated "key executives" are also issued parking permits. Unlike car pool parking permit applications, those for handicapped employees and key executives are not competed, and are not included in this review.

²The date of initial entry into federal service. This date is routinely used by personnel offices when determining employment benefits, such as annual leave.

³The application form was amended to include this warning in response to the 1990 OIG audit recommendations.

application qualifications, or for violation of other agency car pool practices and requirements.

After DAS makes an initial review of the applications, the Office of Information Systems (OIS) processes the applications and calculates applicant points, which determine who receives a parking permit. Points are based primarily on years of federal government service, the number of car pool participants, and the frequency of car pool riders. Each car pool participant who is a current federal employee gets one point for each year of service, determined by the SCD. All NSF participants receive an additional 10 points. Participants who do not ride both to and from work each day are given one point for each scheduled one-way trip during a 1-week period (e.g., a car pool member who rides to and from work 3 days per week would receive six points). After the points are calculated, car pools are ranked and those with the most points are awarded permits. In the past, almost all applicants were awarded a car pool permit because of limited competition.

Car pool permits are awarded for a 6-month period, beginning April 1 and October 1. Permits must be picked up and paid for by the fourth day of each month in the semiannual period or DAS revokes the permit for the remainder of the period. If car pool membership drops below two full-time participants, the permit expires at the end of the month unless another full-time rider is recruited. During the most recent semiannual period, October 1992 to March 1993, each car pool paid \$82.50 per month to park at the 1800 G Street facility;⁴ \$82.50 per month to park at the 2000 L Street facility; and \$62.50 per month to park at the 1110 Vermont Ave facility. NSF matched these costs.

In the semiannual period ended March 30, 1993, NSF contracted for approximately 183 parking spaces for allocation to this system.⁵ There were 163 parking spaces located in the G Street facility, 9 spaces located at the L Street facility, and 11 spaces located at the Vermont Avenue facility. In 1992, NSF spent a total of \$185,147.50 to subsidize parking. Of that amount, \$167,310 was spent to subsidize parking at the G Street facility, \$8,985 at the L Street facility, and \$8,852.50 at the Vermont Avenue facility.

1990 OIG Audit

In response to allegations of abuse, OIG conducted an audit of the agency parking permit program in 1990. The findings of the audit

⁴Effective February 1, 1993, the rate at 1800 G Street was increased to \$84 per month.

⁵The actual number fluctuated from month to month due to car pool terminations and new registrations.

supported the continuation of the current car pool parking permit program. However, the audit uncovered many weaknesses in the program, including a lack of understanding of program requirements. The audit also found a need for greater accuracy in the screening of information submitted on application forms. As a result, OIG made several systemic recommendations to DAS to make the program more effective and efficient. DAS concurred with and implemented the recommendations. Notices were then issued to all NSF staff reminding them of the rules that apply to parking permits. In addition, the application forms were amended to include the statement, "Warning: Employees who submit fraudulent applications will have parking privileges revoked for a minimum of six months."

Recent Allegation

In 1992, we received subsequent allegations of abuse in the car pool parking permit program. In response, we reviewed the parking permit applications of seven employees. We identified false information when we analyzed these parking permit applications. Based on this, we expanded our investigation to include reviewing the parking permit applications of 70 employees. Our review covered parking applications submitted during four semiannual competitions: March 1991, September 1991, March 1992, and September 1992.

Findings

Of the 70 applications reviewed, we found that 37 listed accurate information. On the remaining applications, we found a total of 21 employees who provided minor misrepresentations that would not have affected DAS's decision to award parking permits to legitimate car pools. We also found 22 employees who did not participate in legitimate car pools because they provided false information to obtain parking permits. Of the 22, 11 employees claimed that they did not intend to provide false information. We believe that, because these employees often provided false statements on more than one application, the false statements were made in reckless disregard of the truth. We also identified 11 employees who admitted, or did not contest our conclusion, that they intentionally submitted false statements so that they could obtain subsidized parking privileges. Based on the false statements of these 22 employees, NSF subsidized the parking costs of employees who did not have legitimate car pools.

Findings of Minor Misrepresentations

We found that 21 employees made minor misrepresentations on their parking permit applications that did not affect the awarding of a

permit to a legitimate car pool. Examples of minor misrepresentations are: inaccurately listing the frequency of riders in the car pool; listing SCD's for non-federal employees; and listing persons who dropped out of the car pool as riders. We found that the most common of these was the inaccurate listing of riders' frequency. When applicants were questioned about this, their response was that they did not understand how to list the frequency of their riders on the application forms. As a result, part-time riders were often misrepresented as full-time riders, for which car pools were awarded more points in the parking permit competition. Although these applicants showed no intent to deceive NSF, they clearly ignored or overlooked the instructions on the back of the application forms, which state how to represent the frequency of riders in the car pool. However, because these applicants actually had sufficient riders to constitute a car pool, the subsidization of their car pool was not inappropriate and caused no loss to NSF.

False Statements Made in Reckless Disregard of the Truth

We found 11 employees who did not admit to intentional falsification, but, in our view, nonetheless acted in reckless disregard of the truth by providing material false statements on their parking permit applications. Of the 11 employees, 9 were represented on the application forms as principal drivers, and 2 were represented as car pool riders. Although instructions for filling out application forms are stated on the back of the application forms, these employees stated that their false statements were unintentional and due to either ignorance or a misunderstanding of applicable instructions and regulations. However, we often found that these employees repeatedly provided false statements, and that they would not have been eligible for a car pool permit had accurate information been listed. Car pool participants are expected to read the instructions before filling out permit applications. Participants are also expected to understand and abide by parking permit regulations that are clearly defined in the semiannual bulletins issued to all NSF staff. Overall, we found that this information was repeatedly ignored or overlooked by these employees, which demonstrates a reckless disregard for the truth.

For example, we found that the principal driver of a car pool falsely represented her two part-time riders as full-time on the March 1991, September 1991, March 1992, and September 1992 parking permit applications. From April 1991 to February 1993, the riders were present only 3 to 4 days per month, and the principal driver often drove to work alone. She stated that she was not aware that she needed a full-time rider to qualify for a car pool parking permit. We found, however, that the principal driver had participated in the car pool program for approximately 15 years, and that each rider had participated for several years. The

principal driver expressed remorse at violating the parking permit regulations and offered to reimburse NSF for the funds spent on subsidizing her parking.

In another case, a principal driver falsely represented two part-time riders as full-time on the March 1992 parking permit application. One of these riders dropped out of the car pool in April 1992, and the other rider rode in the car pool approximately 3 days per week throughout the 6-month period. On the September 1992 application, the principal driver continued to represent one part-time rider as full-time, though he still rode an average of 3 days per week. The principal driver also falsely represented one rider as having an SCD when that rider was not a federal employee. The principal driver stated that she did not understand that car pools are required to have at least two full-time participants, and she stated that she did not mean to misrepresent her riders as full-time. However, NSF subsidized her parking from April 1992 to January 1993 based on false statements submitted on her applications. The principal driver voluntarily terminated her car pool in January 1993.

Intentional False Statements

We found that 11 employees intentionally provided material false statements on their parking permit applications. Of these 11 employees, 4 were listed on the application form as principal drivers, and 7 were listed as car pool riders. In each case, we found that the participant knowingly, and often repeatedly, submitted false statements to receive a parking subsidy to which they were not entitled.

For example, we found that the principal driver of a car pool, who had participated in the NSF parking permit program for several years, submitted four applications with intentional false statements. The principal driver admitted under oath that he recruited employees to falsify ridership in order to obtain a parking permit. We found that on the September 1992 parking permit application, the driver falsely represented his two part-time riders as full-time. On the March 1991, September 1991, and March 1992 applications, the driver recruited other employees to sign his application as full-time riders so that he could qualify for a parking permit. We found that six of the recruited employees did not ride in the car pool. Four of the six employees subsequently stated under oath that they never intended to ride in the car pool, and that they provided false statements on the application forms to help the principal driver obtain a parking permit. We also found that the principal driver often drove a two-seated sports car to work, even though three or more car pool participants were listed on each application. We determined that during the four semiannual periods, there were no full-time riders in the car pool and concluded that the driver had falsely represented himself as having

a car pool from April 1991 to January 1993.

In a similar case, we found that an NSF employee intentionally submitted false statements on three car pool applications that represented her as being a member of a car pool. In March 1991, this employee began riding in a car pool on a part-time basis with a fellow NSF employee and friend. In the summer of 1991, the friend dropped out of the car pool, and the employee began driving to work alone, using the friend's parking permit. When the parking permit expired, the employee continued to submit parking permit applications with the assistance of her friend. The employee submitted applications in September 1991, March 1992, and September 1992, listing the names of four false riders. Of the four riders, we found that three intentionally misrepresented that they rode in the car pool. Though they stated under oath that they did not ride in the car pool and did not intend to ride in the car pool, these three persons signed the application forms to help the driver obtain a parking permit. The fourth person had retired from NSF in December 1991; before her retirement she used public transportation (bus) to commute to work. This person did not sign any of the parking permit applications, and she was not aware that her name was listed on the forms. We concluded that the NSF employee had falsely represented herself as having a car pool from September 1991 to December 1992. Moreover, this employee provided false statements during two interviews and while providing a statement under oath.

Systemic Weaknesses in the Permit Application Process

We found that several systemic weaknesses existed in the parking permit application process. We found that the semiannual bulletins and the parking permit application forms did not contain provisions for updating car pool information during semiannual periods. Thus, the principal driver often did not know the procedures for updating the application form if a rider listed on the form dropped out of a car pool shortly after the parking permit was awarded. In one case, we found that during a 6-month period, two full-time riders and one part-time rider dropped out of a car pool, all within 1 month of the permit being awarded. The principal driver claimed that he did not know how to report these changes, which had left him without a legitimate car pool for several months.

We found another systemic weakness in the lack of provisions prohibiting employees from signing application forms for one another. We identified several instances where this had occurred, in some cases with the employee's permission, and in other cases, to falsify ridership. We also found the need for applicants to certify their understanding of the parking program. We believe that a provision requiring the signature of all applicants, attesting to their understanding of car pool eligibility and application rules, would help to ensure fewer violations in the

future.

Conclusions

Twenty-one employees made minor misrepresentations on their parking permit applications. We considered these misrepresentations to be the least serious, because they did not affect the proper awarding of parking permits, and thus did not cause NSF to subsidize illegitimate car pools. In many of the cases where minor misrepresentations were found, we counseled the employees, most often the principal drivers, about car pool requirements and the importance of accurately representing information on their parking permit applications.

Eleven employees, both principal drivers and riders, intentionally made false statements that caused NSF to award permits to and subsidize illegitimate car pools. Another 11 employees made false statements in reckless disregard of the truth. Even if these applicants did not intend to provide false information, they nevertheless caused NSF to award permits to, and subsidize illegitimate car pools.

Overall, we identified extensive false statements on NSF parking permit applications, which supports widespread abuse of the parking permit program. By subsidizing illegitimate car pools, NSF wasted approximately \$12,500⁶ over the past 2 years.

All of the false statements and minor misrepresentations were made despite clearly stated information regarding car pool regulations and application rules. This information was contained in the semiannual parking permit bulletins, as well as printed directly on the back of all parking permit application forms. We believe that this information was ignored or overlooked by many persons, often repeatedly, over several years.

We also identified several systemic weaknesses that exist in the parking permit program. Those weaknesses include a lack of provisions for updating car pool applications and for prohibiting employees from signing application forms for one another. We also identified the need for a signed statement certifying that employees understand eligibility and application rules for car pools.

⁶This figure was derived by adding the number of months each illegitimate car pool was subsidized (yielding a total of 154 months), then multiplying by the applicable monthly parking rate.

Recommendations

Based upon our findings and conclusions, we recommend that DAS:

- (1) Clarify application instructions and explain more clearly the system for awarding of points;
- (2) Emphasize driver responsibility for the accuracy of information submitted;
- (3) Notify employees that changes in car pool membership must be reported to DAS as they occur, and that employees may not sign application forms for one another; and
- (4) Require all car pool applicants to sign an acknowledgement of understanding of car pool regulations and application rules.

DAS Response

DAS has accepted our recommendations and has implemented them. DAS has also decided to eliminate 31 car pool parking permits, both in response to our investigation and in an effort to ease budgetary constraints. This will result in a cost savings of over \$31,000 per year.

In addition, in response to the widespread abuse we found in the parking permit program, we recommend that:

- (5) NSF review the actions of individual employees in this matter to determine whether disciplinary action is appropriate.⁷
- (6) NSF's Director issue a memorandum to all staff, advising them of the extensive abuse that was found in the parking permit program and informing all employees that they must be truthful when applying for federal employment privileges.

⁷Our pre-decisional recommendations on disciplinary action for specific employees are in a separate report.

MEMORANDUM

DATE: April 16, 1993

FROM: Director, Office of Information and Resource Management

SUBJECT: Response to Report of Investigation - Systemic Recommendations
(OIG Case Number I92030008)

TO: Inspector General

The Office of Information and Resource Management has reviewed the subject report, "Abuse of Car Pool Program by NSF Employees," and concurs with the report's systemic findings and recommendations. As noted in the report, the four recommendations have already been implemented by the Division of Administrative Services (DAS).

The recommendations, which were first made to DAS in discussions held during the OIG's review of the car pool program, were incorporated in NSF Bulletin No. 93-06 issued March 4, 1993. The Bulletin announced the competition for parking permits for the April 1, 1993 - September 30, 1993 period and implemented the OIG's recommendations in informational materials, and the newly-created Acknowledgement Form, attached to the Bulletin.

In addition, I plan to issue a Bulletin next week to all employees on the parking program findings.


Constance K. McLindon

NATIONAL SCIENCE FOUNDATION
OFFICE OF INFORMATION AND
RESOURCE MANAGEMENT
Washington, D. C. 20550

NSF BULLETIN NO. 93-15

April 28, 1993


ADMINISTRATION AND MANAGEMENT

SUBJECT: Parking Permit Application Problems

A recent review of the NSF Employee Parking Program, conducted by the Office of the Inspector General, revealed that many of the applications for car pool parking permits contained inaccurate information.

This is to remind current and prospective participants in the car pool subsidy program that they are personally responsible for assuring that all information on permit applications is accurate. Changes in ridership status must be conveyed to the Division of Administrative Services as soon as they occur.

Individuals who benefit from the parking subsidy as a result of inaccurate or misleading information about their eligibility are subject to the loss of participation in the program as well as disciplinary actions including reprimands, suspensions or removal from Federal employment.


Constance K. McLindon
Director
Office of Information and
Resource Management

Distribution: All Employees
Cancellation Date: Effective Until Cancelled
Originating Unit: Division of Administrative Services

NATIONAL SCIENCE FOUNDATION
OFFICE OF INFORMATION AND
RESOURCE MANAGEMENT
Washington, D. C. 20550

NSF BULLETIN NO. 93-06

March 4, 1993

ADMINISTRATION AND MANAGEMENT


SUBJECT: NSF Employee Parking - April 1, 1993 through
September 30, 1993

The Division of Administrative Services is currently accepting applications for parking permits for the period April 1, 1993 through September 30, 1993. Members of carpools (two or more people commuting to work on a daily basis) or persons with disabilities may apply for the permits. The monthly charge to eligible carpools will be \$84.00 during this period.

Applications will be competitively ranked for eligibility in accordance with the criteria described on the attachment to this bulletin. However, due to budget constraints, the number of available parking spaces will be reduced for the carpool competition scheduled for April through September 1993. While it is anticipated that spaces available will be sufficient to include carpools ranked in the 30 to 40 point range, carpools falling below this range may wish to consider expansion of their ridership.

Employees may apply for a permit by submitting a completed "Application for Parking Permit" (NSF Form 566) to the NSF Cashier in Room 248 not later than close of business March 12, 1993.

Information on application procedures is provided in the attachment to this bulletin. Questions regarding the program should be referred to Veronica Bankins at 357-7922.


Constance K. McLindon
Director
Office of Information
and Resource Management

Attachment

Distribution: All Employees
Cancellation Date: September 30, 1993
Originating Unit: Division of Administrative Services

APPLICATION PROCEDURES

LOCATIONS

Application forms are available at the following locations:

- | | |
|---------------|------------|
| - G Street | Room 248 |
| - L Street | Room 602 |
| - Vermont Ave | Room V-502 |

INSTRUCTIONS

See the reverse side of the application form for instructions on completing the Application for Parking Permit.

All information, including carpool control numbers, employee payroll numbers and service computation dates must be legible and correct.

Non-NSF riders must list business addresses and telephone numbers where they may be contacted for verification.

Incorrectly completed forms will be returned and will not be included in this competition unless corrected and resubmitted not later than March 12, 1993.

SIGNATURES

Applications must be signed by all carpool participants. Individuals may not sign for one another. If an applicant is on leave, the Cashier must be informed; the applicant must come to the Cashier's station and sign the form within 8 hours after his/her return to work.

SUBMISSION

LOCATION. Forms must be submitted to the NSF Cashier in Room 248. The Cashier is the point of contact for information on completion of parking applications.

REQUIREMENTS. Forms must be received not later than close of business on March 12, 1993.

Persons with disabilities who hold current parking permits must submit new applications. Renewal is subject to re-evaluation and certification by the Director, Health Services.

ELIGIBILITY CRITERIA AND BOUNDARY RESTRICTION

ELIGIBILITY CRITERIA

Carpools will be ranked for eligibility by a point system and permits will be issued to each principal driver in accordance with the ranking.

POINT VALUE	ELEMENT
10	for each NSF full-time employee in the carpool
1	for each year of Federal service for each rider
10%	part-time riders will be given 10% for each one-way trip taken (NOTE: part-time is defined as a minimum of three one-way trips per week by the same person. Examples: (1) 3 one-way trips per week equals 30 points; (2) 5 one-way trips per week equals 50 points.)

When applications exceed spaces available, ties will be resolved in the following order of precedence:

1. carpools with larger numbers of NSF personnel
2. carpools with larger numbers of total riders

The Procurement Section, DAS, will maintain a waiting list in priority order for interim permit assignments due to carpool membership turnover.

BOUNDARY RESTRICTIONS

Because the point system is being used to rank applications, boundaries previously noted in NSF Manual 1, Chapter V-200, Subchapter 252, are no longer applicable.

CHANGES IN RIDERSHIP

Due to changes caused by the impending relocation, your assistance is essential in keeping carpooling information current. Therefore, DAS must be officially notified (e:mail, letter or memo) by a member of the carpool of the following changes within 24 hours of any of these occurrences:

1. - one or more riders drop from the carpool
2. - one or more riders added to the carpool
3. - a combination of 1 and 2 above
4. - anticipated temporary reduction in the number of riders for 30 days or more (ie: due to leave, travel, etc)

Abuse of Carpool Program by NSF Employees

Recommendations Regarding Individuals¹

We recommend the imposition of sanctions on employees who have clearly abused the parking system. The false statements provided by numerous employees plainly violated parking permit application regulations requiring the accuracy of all information submitted. In some cases, employees intentionally provided false statements to fraudulently obtain car pool parking permits. In other cases, employees' reckless and repeated false statements caused NSF to subsidize the parking of employees who did not have legitimate car pools.²

Twenty-one employees provided minor misrepresentations. These employees showed no intent to deceive NSF, and the subsidization of their car pools was not inappropriate. Nonetheless, they clearly ignored or overlooked the instructions on the back of the application forms, and in most cases repeatedly submitted inaccurate information. We recommend that warning letters be sent to the following 21 employees:



¹The purpose of this report is to advise NSF of our recommendations for sanctions against certain employees for their actions in this matter. Under the Inspector General Act of 1978, as amended, we have authority only to recommend, not to impose, sanctions. Accordingly, it is our view that this is a pre-decisional document, the disclosure of which would constitute a clearly unwarranted invasion of the personal privacy of the persons discussed, which NSF should therefore withhold from the public under exemption five of the Freedom of Information Act, 5 U.S.C. § 552(b)(5).

²We have detailed supporting documentation of our findings in each individual case. Management officials may contact our office if they wish to review this documentation.

Finally, we found that the three remaining employees (DEB), (AST), and (SIS)) provided intentionally false statements to personally benefit from obtaining a car pool parking permit (these employees frequently drove to work alone). We determined that the actions of these three employees were the most egregious and abusive of all violations. We based this determination on the following:

- o All three employees knowingly and repeatedly submitted false statements in order to receive parking subsidies to which they were not entitled.
- o All three caused extensive loss to NSF through the subsidization of illegitimate car pools.
- o The financial loss to NSF caused by these employees amounted to over \$5,000 of the \$12,000 total loss.
- o () and () both provided false statements to the Investigations Unit while under oath.
- o () attempted to obtain further subsidized parking even after his abuse was uncovered and he was informed that he was no longer eligible to apply for a car pool permit.

We believe that letters of reprimand are appropriate for these employees. Also, because we consider their actions to be serious, we recommend that NSF consider further administrative action against these employees, including, but not limited to, reimbursement to NSF for the parking subsidies which they fraudulently obtained. The following table displays the loss caused to NSF by these employees.

INTENTIONAL LOSS CAUSED TO NSF

Period Without Legitimate Car Pool	Total Number of Months	Cost per Month	Total Loss To NSF
Sept. 1991 - Dec. 1992	16	\$82.50	\$1,320.00
Apr. 1991 - Jan. 1993	22	\$82.50	\$1,815.00
Apr. 1991 - Feb. 1993	23	\$82.50	\$1,897.50

Total = \$5,032.50

MEMORANDUM

DATE: April 16, 1993

FROM: Director, Office of Information and Resource Management

SUBJECT: Response to Report of Investigation - Systemic Recommendations
(OIG Case Number I92030008)

TO: Inspector General

The Office of Information and Resource Management has reviewed the subject report, "Abuse of Car Pool Program by NSF Employees," and concurs with the report's systemic findings and recommendations. As noted in the report, the four recommendations have already been implemented by the Division of Administrative Services (DAS).

The recommendations, which were first made to DAS in discussions held during the OIG's review of the car pool program, were incorporated in NSF Bulletin No. 93-06 issued March 4, 1993. The Bulletin announced the competition for parking permits for the April 1, 1993 - September 30, 1993 period and implemented the OIG's recommendations in informational materials, and the newly-created Acknowledgement Form, attached to the Bulletin.

In addition, I plan to issue a Bulletin next week to all employees on the parking program findings.