




March 14, 2017

MEMORANDUM FOR: Leonard Bechtel
Acting Assistant Secretary for Communications and Information
National Telecommunications and Information Administration



FROM: Andrew Katsaros
Assistant Inspector General for Audit Quality and Broadband

SUBJECT: Expanding Monitoring Controls Will Strengthen the Management
of the State and Local Implementation Grant Program (SLIGP)
Final Report No. OIG-17-018-A

This final report provides the results of our audit, which addresses our objective to evaluate the National Telecommunications and Information Administration's (NTIA's) management of the State and Local Implementation Grant Program (SLIGP). We also reviewed the National Institute of Standards and Technology's (NIST's)¹ related administration, reviewed relevant policies and procedures, assessed grant file documentation for a non-statistical sample of eight grant recipients, and interviewed NTIA and NIST officials involved in grant awarding and monitoring.² See appendix A for specific details on our objective, scope, and methodology.

We generally found NTIA's and NIST's processes for respectively managing and administering SLIGP to be reasonable; however, we identified opportunities to address control weaknesses and improve management of this grant program. For further details, please see findings and recommendations.

Background

The Middle Class Tax Relief and Job Creation Act of 2012 (the Act) required NTIA to establish and manage SLIGP and led to \$116.5 million in grant funds for states and territories to participate in planning the First Responder Network Authority's (FirstNet's) National Public Safety Broadband Network (NPSBN or network).³ The NPSBN is a planned nationwide telecommunications network dedicated to public safety first responders that will address communications failures such as those that occurred on September 11, 2001. The Act requires FirstNet to "consult with regional, State, tribal, and local jurisdictions" on specific topics related

¹ NTIA signed an interagency agreement with NIST to provide grants administration services on NTIA's behalf.

² We did not analyze NTIA's or NIST's closeout processes because all SLIGP grants were active at the time of our review.

³ Public Law 112-96, §§ 6301-02, 126 Stat. 156, 218-21 (2012).

to establishing the NPSBN: network construction; tower placement; network coverage; security; local public safety entities' access to the network; assignment of priority among those local entities; and training for local users of the network.⁴ SLIGP funds support the process for that consultation.

In general, SLIGP funding “provides recipients with the resources to work with stakeholders throughout the state or territory to identify needs, gaps, and priorities for public safety wireless broadband.”⁵ Additionally, funds allow states and territories to identify, plan, and implement the most efficient and effective means to use and integrate telecommunications infrastructure associated with the NPSBN to satisfy their wireless communications and data services needs.

NTIA, with grants administration support from NIST, manages SLIGP. NTIA is responsible for the programmatic aspects of SLIGP and has assigned four Federal Program Officers to monitor and provide oversight of the work being conducted under the program. NTIA signed an interagency agreement with the NIST Office of Acquisition and Agreements Management (OAAM) to assume grant administration responsibilities on NTIA's behalf, such as awarding SLIGP grants, maintaining official award files, and coordinating with NTIA's program staff.⁶

In calendar years 2013 and 2014, NIST awarded \$116.5 million in SLIGP grant funds to 54 out of 56 U.S. states and territories.⁷ As of September 30, 2016, recipients drew down approximately \$42.7 million—about 37 percent of the total awarded. Most grant recipients are required to provide a cash or in-kind match of their own resources in the amount of 20 percent of the total award.⁸ The grant amounts were based on population size and geographic area, ranged from \$500,000 to \$5.8 million,⁹ and will expire between December 2017 and February 2018.¹⁰ To date, states and territories have used funds to conduct outreach and educate public safety stakeholders, identify potential users of the NPSBN, consult with FirstNet regarding the NPSBN development, and engage in collecting public safety and broadband network data requested by FirstNet.

As identified in the SLIGP Federal Funding Opportunity (FFO) notification announced in February 2013 and incorporated into grant terms and conditions, SLIGP recipients are required to show they are on track to accomplish the following six priorities throughout the grant period:

⁴ Id. at § 6206(c)(2).

⁵ NTIA, *The State and Local Implementation Grant Program, for Public Safety Broadband Planning*.

⁶ Interagency agreements are written agreements between federal agencies in which one agency obtains goods or services from another. They establish the general terms and conditions that govern the relationship between the agencies and bring to bear the efficiencies and economies associated with leveraging resources. Here, NTIA's program expertise is joined to NIST's grants management capabilities. Both are bureaus within the Department of Commerce, and NIST routinely provides grants management services for other Department of Commerce grant programs.

⁷ Mississippi and Commonwealth of Northern Mariana Islands do not have SLIGP funds.

⁸ Public Law 112-96, § 6302(b). The SLIGP recipients in Guam, American Samoa, and the U.S. Virgin Islands received a match waiver; therefore, they are not required to contribute non-federal resources.

⁹ NTIA, *The State and Local Implementation Grant Program for Public Safety Broadband Planning*.

¹⁰ NTIA, *SLIGP 2.0 Grant Awards*, November 7, 2016, 5.

1. establish or expand a governance structure to consult with FirstNet;
2. develop procedures to ensure local and tribal representation and participation in the consultation process;
3. create a process for education and outreach among local and tribal officials, public safety users, and other stakeholders about the NPSBN;
4. identify potential public safety users of the network;
5. develop staffing plans that include local and tribal representation to participate in the public safety governance structure and to prepare for data collection activities in consultation with FirstNet; and
6. prepare a comprehensive plan describing the public safety needs that they expect FirstNet to address in its design of the network, as well as how they intend to satisfy each of the elements enumerated above, including milestones that demonstrate their progress.¹¹

Based on recipient-wide spending patterns, NTIA expects that approximately \$47 million of SLIGP funds (about 40 percent of the \$116.5 million originally awarded) will remain unspent when grants are set to expire.¹² NTIA will not extend the period of performance for any of these original SLIGP grants; however, subject to the availability of these excess funds, NTIA plans to release a new FFO to award grants under SLIGP 2.0—the next generation of SLIGP grants.¹³ Only states deciding to opt-in to FirstNet’s plan for deploying the Radio Access Network (RAN) will be eligible to submit an application for SLIGP 2.0 funding.¹⁴

By funding state planning activities, SLIGP plays a critical planning role in FirstNet’s development of the NPSBN. It is, therefore, vital that SLIGP grantee progress be managed to ensure that states and territories (1) accomplish SLIGP goals and (2) use grant funds effectively and efficiently. During the course of the audit, we noted progress in the following areas:

¹¹ NTIA, *Announcement of Federal Funding Opportunity*, 4. The FFO originally contained a seventh priority to develop “a standard Memorandum of Agreement (MOA) to facilitate the use of existing infrastructure with private sector entities that have been chosen by FirstNet to build, operate, and maintain the network on public safety infrastructure, or identified the legal barriers to creating a standard MOA and describe potential remedies.” However, on March 24, 2015, NTIA waived this requirement.

¹² NTIA, *State and Local Implementation Grant Program (SLIGP) Budget Modification Guidance*, 1 (Nov. 7, 2016). NTIA noted that “due to the allocation formula for SLIGP grants and lower-than-anticipated costs for grant-funded activities, many recipients have expended their grant funds at a lower rate of spending than [NTIA] anticipated initially.” *Id.*

¹³ *Id.*

¹⁴ *Id.* According to FirstNet, “RAN includes cell towers as well as mobile hotspots embedded in vehicles that backhaul to the core network over satellite or other types of wireless infrastructure. Comprehensive RAN planning is required to optimize coverage, capacity and performance for a nationwide network[,]” and “[s]tate by state, FirstNet needs to understand public safety coverage needs.” The Act states that governors must eventually decide whether their states will opt-in or opt-out of the RAN proposed by FirstNet. Public Law 112-96, § 6302(e)(2). States make this decision after receiving a final State Plan, prepared by FirstNet, containing the details of the proposed buildout. *Id.* § 6302(e)(1). If states opt in, FirstNet will deploy the RAN within the state. Regardless of the decision, the state network must interconnect with the FirstNet Core network. *Id.* § 6302(e)(3)(C)(i).

- NTIA established reasonable communication and reporting lines with relevant stakeholders. Specifically, NTIA
 - consistently held quarterly calls with award recipients to discuss SLIGP progress,
 - published SLIGP guidance and instructions on the NTIA website,
 - posted aggregate SLIGP results on a quarterly basis on the NTIA website, and
 - established a process to routinely meet with FirstNet officials and NIST staff to discuss SLIGP.
- NTIA and NIST established internal guidance to manage the SLIGP awards.

Findings and Recommendations

We generally found NTIA’s process for managing SLIGP to be reasonable. We examined a non-statistical sample of eight SLIGP awards and did not detect any material errors or issues in the processes to (a) award SLIGP grants based on the criteria it established in the FFO announcing the grant program and (b) maintain adequate award and monitoring documentation in the official grant files.

However, we also identified opportunities to address control weaknesses and improve management of this grant program. Specifically, NTIA and NIST control processes for detecting fraud, waste, and abuse are incomplete. Further, NIST’s information technology controls are not adequate to ensure data transfer errors are identified and corrected timely. Additionally, NTIA did not maintain readily available assessments of each recipient’s status towards achieving SLIGP priorities.

I. Existing NTIA and NIST Monitoring Controls Are Incomplete

A. *NTIA’s and NIST’s control processes for detecting fraud, waste, and abuse are incomplete*

NTIA and NIST currently neither verify results self-reported by recipients nor perform a draw-down trend analysis, thereby limiting their ability to detect fraud, waste, or abuse.

NTIA reviews of Performance Progress Reports (PPRs) rely upon information reported by grant recipients without independent verification by NTIA or NIST.¹⁵ NTIA tracks SLIGP progress by reviewing results self-reported by the recipients on quarterly PPRs, such as the number of stakeholders engaged, governance meetings held, or number of outreach materials distributed; but, NTIA officials stated that they do not request and review supporting documentation to verify the accuracy of these results. Similarly, NIST grants management officials stated that, as part of their normal grant management process, they do not normally request and review supporting documentation for these self-reported results.

¹⁵ Grant recipients are required to complete and submit PPRs each quarter ending March 31, June 30, September 30, and December 31, showing the actual accomplishments during the reporting period. NTIA posts recipients’ PPRs to the NTIA SLIGP website.

Additionally, neither NTIA nor NIST performs a trend analysis to examine grant recipients' detailed draw-downs throughout the grant period. As part of its review of recipient-submitted quarterly Federal Financial Reports (FFRs), NIST compares total expenditures to the total amount of cash drawn-down to ensure recipients are not retaining excess cash on hand. Also, NTIA reviewed total expenditures to determine the rate at which recipients were spending overall SLIGP funds and whether a recipient was at risk of spending funds too quickly. Further, NIST compares federal and recipient-funded spending to determine whether recipients are on track to meet their overall requirement to match 20 percent of their own resources. However, neither NTIA nor NIST completes a draw-down trend analysis to determine whether specific draw-down amounts were abnormal. For example, abnormal amounts may be unusually large, isolated draw-downs that raise red flags. Not performing a draw-down analysis sacrifices a useful tool to identify these irregular patterns that could lead to (a) the discovery of fraud, waste, or abuse or (b) discussions with recipients and a better understanding of reasons for abnormal draw-down amounts.

The Government Accountability Office's (GAO's) *Standards for Internal Control in the Federal Government (Standards for Internal Control)* states, "Management should consider the potential for fraud when identifying, analyzing, and responding to risks."¹⁶ One fraud risk factor to consider is the opportunity for fraud, which is when "[c]ircumstances exist, such as the absence of controls, ineffective controls, or the ability of management to override controls, that provide an opportunity to commit fraud."¹⁷

NTIA officials stated that they relied on NIST's review of recipients' A-133 single audit reports to verify expenditures; however, these reviews provided limited coverage for verifying SLIGP expenditures or PPR results.¹⁸ Independent auditors perform the A-133 single audit on the recipient's organization as a whole and not specifically for SLIGP. Independent auditors also apply a risk-based approach and focus on major programs, which are determined by programs where the recipients spend large dollar amounts. SLIGP is not typically classified as a major program. We reviewed FY 2015 A-133 single audit reports for the eight recipients in our sample and found that SLIGP funds represented significantly less than one percent of the total federal funds spent by these recipients, and SLIGP was not identified as a major program. Therefore, under the A-133 single audits, verification of costs and evaluations of internal control for specific activities related to SLIGP may have been limited or non-existent.

Without control activities to analyze draw-down amounts or verify self-reported costs, the opportunity for fraud, waste, or abuse increases. Also, because program results are self-reported without verification, NTIA and NIST have limited assurance that these results are accurately reported by recipients.

¹⁶ GAO, September 2014, *Standards for Internal Control in the Federal Government*, GAO-14-704G, 70.

¹⁷ *Id.* at 41.

¹⁸ All non-federal entities, including SLIGP recipients, that expend more than \$750,000 or more of federal grant funds in a year are required to obtain a single audit in lieu of multiple audits of individual programs.

B. NIST controls are not adequate to ensure data transfer errors are identified and corrected timely

In March 2016, SLIGP and other federal grant program recipients drew down \$1.1 million of federal grant funds that were not reflected timely in NIST's Grants Management Information System (GMIS)—an information system that is meant to allow NIST to document and track grant spending throughout the grant period. In testing data reliability, we noted that approximately \$275,000 of SLIGP federal draws made by grant recipients on one particular day—March 25, 2016—were successfully recorded in the Commerce Business System (CBS)—the Department of Commerce's (DOC's) official record of transactions—but were not included in GMIS. In response to OIG's request for clarification, NIST stated that, following the March 25th draws, its database server experienced an unexpected reboot (it restarted itself), which caused incomplete draw-down data to be transferred to GMIS. Although NIST identified the database reboot issue on March 29, 2016, it did not identify and correct the missing data in GMIS until August—nearly five months following the issue that caused the error.

The incomplete transfers were not corrected timely because automated data transfer controls were not sufficient to identify the incomplete transfer. Instead, NIST identified the missing data during its reconciliation process that compares CBS and GMIS financial data; however, NIST only reconciles this information semi-annually.

GAO's *Standards for Internal Control* states that it is management's responsibility to "design control activities over the information technology infrastructure to support the completeness, accuracy, and validity of information processing by information technology."¹⁹ GAO further states that management relies on "[q]uality information" that is "appropriate, current, complete, accurate, accessible, and provided on a timely basis[,]" allowing management "to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risk."²⁰ GAO additionally notes that, "[a]pplication controls, sometimes referred to as business process controls, are those controls that are incorporated directly into computer applications to achieve validity, completeness, accuracy, and confidentiality of transactions and data during application processing."²¹

As a result of the IT control deficiency and the lack of a timely reconciliation, stakeholders relying on GMIS data did not receive complete, accurate, and timely information on draw-downs between March and August 2016. The grant information accessed through GMIS influences how NIST and other stakeholders manage grants. For instance, NIST OAAM accesses grant draw-down information through GMIS, which contributes to its determination of whether grant spending levels have met the threshold that requires recipients to comply with A-133 single audit requirements. Additionally, NIST's Grants Management Division provides monthly SLIGP grant draw-

¹⁹ GAO, *Standards for Internal Control in the Federal Government*, 53.

²⁰ *Id.* at 60.

²¹ *Id.* at 53.

down reports from GMIS to NTIA, which are used to determine if spending levels reported by recipients are reflected correctly in quarterly PPRs. Because NIST only reconciles GMIS with CBS semi-annually, NIST's controls are inadequate to ensure that data transfers are complete and any issues are corrected timely to allow stakeholders to make appropriate decisions.

II. NTIA Did Not Maintain Readily Available Assessments of Each Recipient's Status Toward Accomplishing SLIGP Priorities

NTIA Federal Program Officers did not consolidate their monitoring efforts into clear assessments of whether recipients were on track to accomplish the six SLIGP priorities identified in their grant terms and conditions and discussed in the background section of this report. NTIA monitored the recipients by various methods, including reviewing recipient-reported quarterly PPRs, conducting quarterly conference calls, and conducting in-person site visits. While NTIA documented each monitoring activity, it did not consolidate its results to produce a readily available comprehensive assessment that clearly identified whether the recipient accomplished, was on track to accomplish, or was at risk of not accomplishing the required six specific program priorities.

The SLIGP FFO states, “[t]hroughout the grant period of performance, NTIA will require recipients to show that they are on track to accomplish” the six SLIGP priorities.²² GAO’s *Standards for Internal Control* states “[m]anagement periodically evaluates the entity’s methods of communication so that the organization has the appropriate tools to communicate quality information throughout the entity on a timely basis[,]” and it considers whether the [i]nformation is readily available to the audience when needed.”²³ Additionally, “documentation . . . provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel, as well as a means to communicate that knowledge as needed to external parties.”²⁴

NTIA Federal Program Officers reviewed quarterly PPRs submitted by the recipients; however, the information reported on the PPRs does not clearly match the six program priorities or indicate whether priorities were accomplished. For example, program priorities state that recipients are required to create a process for education and outreach and develop procedures to ensure local and tribal representation and participation in the consultation process. The PPRs track the number of individual stakeholders reached at outreach meetings each quarter and provide an opportunity for recipients to identify whether tribal groups participated; but, the PPRs do not indicate whether NTIA confirmed or approved the education and outreach processes.

²² NTIA, *Announcement of Federal Funding Opportunity (FFO)*, 4. Initially the FFO announcement included seven priorities, however, on March 24, 2015, NTIA waived the requirement that SLIGP recipients develop a Memorandum of Agreement template by the end of the period of performance.

²³ GAO, *Standards for Internal Control in the Federal Government*, 61, 63.

²⁴ *Id.* at 29.

NTIA also monitored recipients by (1) consistently conducting quarterly calls with each recipient and (2) performing in-person site visits with most recipients.²⁵ NTIA documented each individual monitoring activity, but any one activity would not address all SLIGP priorities. NTIA stated that they could assess the status of the six program priorities for recipients by reviewing all of their monitoring documentation, but a consolidated assessment was not readily available.

NTIA officials considered, but have not used, a checklist or similar tool to track the progress and provide a current assessment of each recipient's accomplishment of the six program priorities. In October 2016, NTIA developed closeout instructions for recipients, which state, "as part of award closeout, recipients should demonstrate that they have completed the program priorities as laid out in the SLIGP FFO."²⁶ However, NTIA itself has not documented the recipients' current completion status.

Without maintaining consolidated, up-to-date assessments, NTIA officials do not have convenient access to this information and, as a result, will not be able to efficiently identify, validate, and communicate recipients' progress towards achieving the six SLIGP priorities required by the grant award terms and conditions. Also, because NTIA's documentation of SLIGP's progress is contained in multiple documents, it is subject to loss of information resulting from routine staff turnover.

Recommendations

We recommend that the NTIA Assistant Secretary for Communications

1. in coordination with NIST, implement procedures to verify grant-related activities and costs reported on PPRs, and perform draw-down trend analyses;
2. consolidate monitoring efforts to provide a current assessment of each recipient's status in completing the 6 SLIGP priorities required by the FFO; and
3. communicate periodically to SLIGP recipients their status of achieving program priorities.

We also recommend that the NIST's Chief Information Officer

4. develop and implement controls to ensure that all data transfers are complete and timely.

On February 17, 2017 and February 21, 2017, OIG received NTIA's and NIST's responses to the draft report, respectively. We include their responses as appendix B of this report. NTIA and NIST agreed with our recommendations and are in the process of implementing corrective action. This final report will be posted on OIG's website pursuant to sections 4 and 8M of the Inspector General Act of 1978, as amended (5 U.S.C. App., §§ 4 & 8M).

²⁵ As of September 29, 2016, NTIA completed site visits with 45 out of the 54 recipients and had scheduled seven site visits for FY 2017. NTIA will not perform site visits for American Samoa and Guam because NTIA decided to perform a desk-review due to the small dollar grant awards.

²⁶ NTIA provided its approved *SLIGP Award Closeout Instructions Package* to the OIG in October 2016. As of the date of this report, NTIA has not distributed this package to the SLIGP recipients but plans to do so prior to grants closing.

In accordance with Department Administrative Order 213-5, please submit to us—within 60 calendar days of the date of this report—an action plan that responds to its recommendations.

We appreciate your cooperation and courtesies extended to us by your staff during our audit. If you have any questions or concerns about this report, please contact me at (202) 482-7859 or Chris Rose at (202) 482-5558.

Appendix A. Objectives, Scope, and Methodology

The objective of our audit was to evaluate NTIA's management of the SLIGP. We assessed the risks related to managing SLIGP and developed our audit program accordingly. We reviewed and evaluated processes in place to award and monitor SLIGP grants. All SLIGP awards remained active during our audit.

To accomplish our objective we

- interviewed NTIA and NIST officials responsible for administering SLIGP to (a) assess their plans, policies, procedures, and guidance during SLIGP management, including whether they monitor self-reported grant progress, and (b) determine whether NTIA had a consultation process with FirstNet;
- reviewed and assessed NTIA's and NIST's policies, procedures, plans, and other guidance used to manage SLIGP and determined whether effective controls were established;
- selected a non-statistical sample of 8 out of 54 SLIGP awards and reviewed NTIA and NIST files to assess whether appropriate actions were taken to award and monitor the grants and to document award actions;²⁷
- analyzed funds spent for each recipient in the sample to determine if spending was within approved budgets, recipients were meeting matching requirements, and spending trends were reasonable;
- requested and assessed documentation for monitoring progress against grant objectives to determine whether objectives were monitored and necessary corrective actions were taken;
- reviewed official grant file documentation to determine if grant files were maintained according to procedures; and
- reviewed grant close-out policies and procedures to determine whether a close-out process was established.

We reviewed the following laws, regulations, standards, policies, and procedures:

- Middle Class Tax Relief Job Creation Act of 2012
- GAO, *Standards for Internal Control in the Federal Government*, (Sept. 2014)
- DOC, *Financial Assistance Standard Terms and Conditions*, (Jan. 2013)
- DOC, *Grants and Cooperative Agreements Manual* (Mar. 2013)

²⁷ We selected our sample based on risk factors such as: high dollar grant amounts; high dollar spending in specific cost categories (such as salaries and equipment); high and low percentages of federal award amounts spent; a variety of grant officers and program officials assigned to grants; and grant recipients that were not meeting the matching requirement to spend 20 percent of total costs from their own funds.

- *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, 15 C.F.R. Pt. 24
- *Cost Principles for State, Local and Indian Tribal Governments*, 2 C.F.R Pt. 225
- NTIA, *Announcement of the Federal Funding Opportunity*
- NTIA and NIST's internal grant management policies and procedures

We reviewed controls significant within the context of the audit objective by interviewing NTIA and NIST officials, examining relevant policies and procedures, and reviewing documentation. In satisfying our audit objective, we relied on both computer-processed data in GMIS and documents submitted by SLIGP grant recipients. We tested the reliability of GMIS data by comparing the data to supporting documentation. With the exception of payment data, we determined that the grant information included in GMIS was sufficiently reliable for our audit. We addressed GMIS payment information issues in section I-B of our report.

We conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform our audit to obtain sufficient, appropriate evidence that provides a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We conducted our review from July 2016 through October 2016 under the authority of the Inspector General Act of 1978, as amended (5 U.S.C. App.), and Department Organization Order 10-13, April 26, 2013. We performed our work at the Department of Commerce headquarters in Washington, DC; NIST offices in Gaithersburg, Maryland; and the OIG regional office in Denver, Colorado.


**Appendix B.
Agency Response**



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

FEB 17 2017

MEMORANDUM FOR: Andrew Katsaros
Assistant Inspector General for Audit Quality and Broadband

FROM: Leonard Bechtel 
Chief Financial Officer and Director of Administration
[Performing the non-exclusive duties of the Assistant Secretary for
Communications and Information]

SUBJECT: NTIA Response to the OIG Draft Report on the State and Local
Implementation Grant Program (SLIGP)

Thank you for the opportunity to comment on the Office of Inspector General's (OIG's) draft report, *Expanding Monitoring Controls Will Strengthen the Management of the State and Local Implementation Grant Program (SLIGP)*. The National Telecommunications and Information Administration (NTIA) agrees with the OIG's three recommendations assigned to the Assistant Secretary for Communications and Information.

In coordination with the National Institute of Standards and Technology (NIST), NTIA will implement procedures to periodically verify samples of recipient-reported activities and costs, as well as, perform periodic draw-down trend analyses. Additionally, NTIA will develop a consolidated tracker to assess recipients' progress toward achieving the six SLIGP program priorities. Finally, consistent with existing monitoring activities, NTIA Federal Program Officers will conduct periodic progress reviews with SLIGP recipients.

Should you have any questions or require additional information, please contact Mike Dame with the NTIA Office of Public Safety Communications at 202-482-1181 or mdame@ntia.doc.gov.

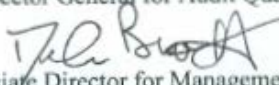
cc: Milton Brown, NTIA Audit Liaison
Amy Egan, NIST Audit Liaison



UNITED STATES DEPARTMENT OF COMMERCE
National Institute of Standards and Technology
Gaithersburg, Maryland 20899

FEB 21 2017

MEMORANDUM FOR Andrew Katsaros
Assistant Inspector General for Audit Quality and Broadband

FROM: Del Brockett 
Acting, Associate Director for Management Resources

SUBJECT: NIST Response to OIG's Draft *Memorandum Expanding Monitoring Controls Will Strengthen the Management Of the State and Local Implementation Grant Program (SLIGP)*

This memorandum responds to the draft memorandum from the Office of the Inspector General entitled, *Expanding Monitoring Controls Will Strengthen the Management of the State and Local Implementation Grant Program (SLIGP)*. The draft memorandum identifies incomplete control processes for detecting, fraud, waste, and abuse and IT control deficiency in ensuring data transfer errors are identified and corrected timely. NIST concurs with the overall findings and recommendations outlined within the draft memorandum.

Further, NIST will develop and submit a corrective action plan to adequately address the risks identified within the OIG's draft memorandum in accordance with OMB Circular A-50 and DAO 213-5.

Cc: Amy Egan, NIST OIG/GAO Liaison
Cecelia Royster, Director, OAAM

NIST

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