

**Investigation of Alleged  
AUO Misuse and  
Falsification of  
Timesheets at U.S.  
Customs and Border  
Protection, Office of  
Internal Affairs,  
Credibility Assessment  
Division (OSC File No.  
DI-14-2511)**





## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

July 21, 2016

MEMORANDUM FOR: The Honorable Russell C. Deyo  
Under Secretary for Management  
Department of Homeland Security

FROM: John Roth *John Roth*  
Inspector General

SUBJECT: Investigation of Alleged AUO Misuse and  
Falsification of Timesheets at U.S. Customs and  
Border Protection, Office of Internal Affairs,  
Credibility Assessment Division (OSC File No.  
DI-14-2511)

The U.S. Office of Special Counsel (OSC) received a whistleblower disclosure concerning the use of administratively uncontrollable overtime (AUO) at the U.S. Customs and Border Protection's (CBP) Office of Internal Affairs (IA), Credibility Assessment Division (CAD). Specifically, the whistleblower alleged:

- CAD employees claim AUO on a daily basis but fail to perform duties that qualify for AUO;
- CAD management instructs employees to falsify timesheets to give the appearance of compliance with governing AUO regulations.

On June 27, 2014, OSC referred this complaint to DHS Secretary Jeh C. Johnson. The Department referred the matter for our consideration, and we agreed to investigate the allegations.

This is not the first allegation of AUO misuse we have reviewed. In OSC File No. DI-14-0666, OSC referred an allegation to DHS that CBP IA employees "claimed AUO on a daily basis but fail to perform duties that qualify for AUO." In response to that referral, DHS OIG evaluated the use of AUO at four CBP IA divisions, including CAD. In our report in that matter, OIG-15-36, provided on May 8, 2015, we concluded that CAD employees' work was administrative, routine, and controllable through normal administrative means, and thus did not qualify for AUO. Our



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work on that matter took place in the months immediately preceding and following the instant referral. Therefore, our prior report directly addressed the first allegation here, and I refer you to that report for a detailed analysis of that allegation. Consequently, this report addresses only the second allegation.

We found no evidence that CAD management instructed employees to falsify timesheets to give the appearance of compliance with AUO regulations. In fact, CAD management provided little to no AUO guidance to CAD employees. What we found was that, as efforts progressed to decertify CAD employees for AUO in early 2014, CAD management incorrectly assumed that polygraphers could remain eligible for AUO if they spent at least three hours per week after normal duty hours in polygraph examinations. Accordingly, CAD management instructed employees to rearrange their schedules so that administrative work was conducted during normal duty hours, thereby delaying the polygraph examinations until later in the day and increasing the likelihood that the exams would extend past normal duty hours. While this manipulation was intended to exploit the AUO regulations, it does not amount to an instruction to falsify any timesheets. Finally, we found that CAD employees were ultimately decertified from AUO in September 2014.

In the course of this investigation, we conducted approximately 14 interviews and reviewed federal regulations, CBP policies, and records and emails provided by CAD employees.

#### *Overview of CAD*

CAD's primary responsibility is to conduct polygraph examinations for CBP applicants. According to the CAD director, the *Anti-Border Corruption Act of 2010* requires all law enforcement applicants to CBP to undergo a polygraph examination before they can be hired. CAD is responsible for these polygraphs and thus its goal is to conduct 900 polygraph examinations per month. This means that each of CAD's approximately 60-70 polygraph examiners is responsible for conducting 12-15 examinations per month.

#### *Overview of AUO*

The Code of Federal Regulations authorizes the payment of AUO "to an employee in a position in which the hours of duty cannot be controlled administratively and which requires substantial amounts of irregular or





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occasional overtime work, with the employee generally being responsible for recognizing, without supervision, circumstances which require the employee to remain on duty.” 5 CFR § 550.151. Further, to qualify for AUO, “the employee must remain on duty not merely because it is desirable, but because of compelling reasons inherently related to continuance of his duties, and of such a nature that failure to carry on would constitute negligence.” 5 CFR § 550.153(c)(2). To illustrate the requirement that hours of duty cannot be controlled administratively, the regulations provide the example of:

an investigator of criminal activities whose hours of duty are governed by what criminals do and when they do it. He is often required to perform such duties as shadowing suspects, working incognito among those under suspicion, searching for evidence, meeting informers, making arrests, and interviewing persons having knowledge of criminal or alleged criminal activities. His hours on duty and place of work depend on the behavior of the criminals or suspected criminals and cannot be controlled administratively. In such a situation, the hours of duty cannot be controlled by such administrative devices as hiring additional personnel; rescheduling the hours of duty (which can be done when, for example, a type of work occurs primarily at certain times of the day); or granting compensatory time off duty to offset overtime hours required.

5 CFR § 550.153(a).

#### *CAD’s Use of AUO*

We interviewed seven CAD polygraphers who stated that the length of their polygraph examinations varied drastically depending on whether issues arise in the exam. According to the polygraphers, exams can run anywhere from 2-10 hours, though most are typically around 4-7 hours. In addition to the exams themselves, the polygraphers also must prepare for the exams ahead of time, set up the room (which takes about an hour), schedule future exams, and write up a report of the exams when they are completed. According to the examiners, the workload cannot be managed in an 8 hour day and many described regularly working more than 10 hours per day. One examiner said that when he



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started with CAD, he was told that he would need to work 20 hours of overtime per pay period to receive AUO.

Up until early 2014, CAD considered all hours worked after the end of normal working hours as AUO. The polygraphers told us that they would use AUO not just if polygraph examinations ran late, but also for report writing, scheduling future exams, training, and other administrative tasks. CAD supervisors and managers also told us that all overtime was considered AUO. In a sworn written statement, the CAD Director wrote that he instructed all employees “to capture all hours worked on the CAD mission that occur outside the normal 8 hours as AUO.” CBP’s Section Chief – Security, who oversees all of CAD, wrote in his sworn statement that prior to April 2014 he believed that CAD employees qualified for AUO and that he told prospective new hires that “they could expect to receive AUO for overtime work.” Finally, a CBP Deputy Assistant Commissioner wrote in his sworn statement that until shortly before giving the statement, he “had no reason to believe AUO was not the proper mechanism for compensating overtime in IA [Internal Affairs].”

According to the CAD employees that we interviewed, there was no formal or substantial guidance on AUO during this time. One polygrapher said that guidance was “intermittent,” and that as an example, he received an email advising him to document any case-related discussions during his commute home as AUO. Another polygrapher said that he received no AUO instruction other than being shown how to fill out the form to record AUO hours. Two midlevel supervisors also confirmed that they did not receive much or any AUO guidance, though one noted that training on CBP’s timekeeping system touched on AUO and other forms of overtime. Three senior managers that OIG interviewed could not recall giving or receiving any written guidance on AUO during this time other than receiving the federal regulations and CBP directives regarding AUO. Two of the senior managers recalled verbally instructing employees to claim and record AUO hours accurately.

#### *Changes to CAD’s USE of AUO*

In late 2013 and early 2014, there was increased attention to the use of AUO at CBP, and in particular, to the Office of Internal Affairs’ use of AUO. This was prompted in part by a series of



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allegations of misuse received by OSC and resulting inquiries and evaluations, as well as by a January 27, 2014 order by DHS Secretary Jeh C. Johnson to immediately suspend AUO for a number of DHS employees. Also at this time, CBP Human Resources Management (HRM) conducted a review of the use of AUO within Internal Affairs and ultimately concluded that CAD polygraphers did not qualify for AUO.

The CAD employees that we interviewed said that AUO began to change around this time. First, there was increased attention to the forms used to record AUO hours. Before this time, the polygraphers did not recall the forms ever being rejected by supervisors or sent back for corrections, other than rare cases with glaring errors, such as a missing name. Some employees said they did not always even submit the forms and they were never questioned about the missing forms. But after this time, several employees said that they started receiving more questions about the forms and were instructed to provide more detail on them. One employee recalled another change during this time. He said that he was still allowed to claim AUO for work done after his normal shift but was no longer allowed to claim AUO for work done before his shift. Travel time also changed at this point. The employees said that before, travel time outside of normal duty hours was generally charged as AUO (though some people apparently charged it as travel compensation time). However, the employees told us that in early 2014, they received a clear instruction that travel was now to be charged as travel compensation time and not AUO.

Most notable were two other instructions to CAD employees during this time. First, CAD polygraphers were instructed to conduct two examinations in a day once per week. The email with this instruction also suggested that polygraphers consider moving weekend examinations to weekdays "so that the extra hours that result would be added to your AUO total hours." (Exhibit 1).

Second, CAD management introduced the "donut hole" concept in April-May 2014. Management believed that adhering to this concept would convince HRM (who was in the process of its AUO review) that CAD should remain eligible for AUO. Under the donut hole theory, employees were instructed to spend at least three hours per week after normal duty hours in an actual exam. Once those three hours were met, then any other overtime hours (such



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as time spent writing reports, scheduling future exams, or other administrative tasks) would qualify as AUO as well.

Management believed that spending three hours in an actual exam would satisfy the “uncontrollable” requirement under the regulations because once an exam began, it truly was uncontrollable how long it would continue. However, the polygraphers told us that exams generally ran at least 4-7 hours. Therefore, scheduling two exams in one day would almost necessarily mean that more than 8 hours would be spent in exams, and thus that extra time would by definition be predictable and controllable in advance, and not uncontrollable. At least one polygrapher raised this concern with his Assistant Special Agent in Charge (ASAIC). (Exhibit 2).

Moreover, polygraphers could, and did, manipulate their schedule to meet this 3 hour requirement by scheduling exams later in the day. It is unclear if polygraphers were specifically instructed by management to manipulate their schedules or if they did it themselves as a logical result of the donut hole instruction. The Executive Director of Human Resources Operations Program and Policy at the time, who was responsible for the HRM review of AUO and ultimately determined that CAD did not qualify, said that it was in CAD’s culture to schedule exams late in the day and that everyone knew how to schedule their overtime to satisfy what they believed were the AUO requirements. One polygrapher told us that he independently decided to start doing his administrative work earlier in the day and scheduling his exams later in the day. He said that he raised this idea with his supervisor and received good feedback, but that it was not the official rule and he did not know if his supervisor had raised it with CBP headquarters. Another said that he generally scheduled his exams in the morning but that there was recent talk of scheduling them later in the day. On the other hand, one polygrapher wrote to his ASAIC about his frustrations about having to manipulate his schedule to meet the three hour requirement, calling it a “case study in insanity” and “essentially ‘cooking the books.’” (Exhibit 3). A couple hours later, the ASAIC wrote to the polygraphers to “stand down” on the recent instructions and to not change their prior scheduling practices in order to avoid “the appearance that our work performance has been altered in any way.” (Exhibit 4).





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However, the next month, CAD employees were again instructed to use the donut hole. First, on May 8, 2014, the Section Chief sent an email to all CAD employees stating that they must spend a minimum of 3 hours per week of AUO in an actual exam to remain qualified for AUO and that supervisors were expected to review the AUO forms to ensure compliance. Second, notes from a May 12, 2014 teleconference with CAD's Director, Section Chief, ASAICs, and others says "ASAICs think about having each of your examiner [sic] schedule one exam in the afternoon to ensure 3 hours of in-room AUO." The notes continue:

- ❖ ASAIC [redacted] AUO/donut-hole, schedule two a day, later in the day, want all to be on the same page and be able to justify should GAO audit  
Director [redacted]: Response - specifics aren't going to fit each examiner, examiners include one exam each week to start in afternoon, will meet the face-to-face time of 3 hours AUO. If leave/training, the examiner should schedule two exams or more for after the normal duty hours. 12 hours in the room with applicant during the month after duty hours in order to support AUO. OCC and HRM will be able to see hours/days/cases that coincide with getting AUO hours. Not sure if it is every pay period, monthly, quarterly, or yearly.  
ASAIC [redacted] Response - With regard to the 3 hours of donut hole, a weekly requirement per Section Chief [redacted]'s email. Is this still left to interpretation or is it set in stone? If GAO comes in, we need to make sure everything makes matches. Come up with a standard.  
Director [redacted] Response - There is no formal plan in place at the moment. There is nothing in writing regarding the 3 hour rule. There will be more discussions later in the week regarding the AUO. Document the truth and make a good faith effort to be in compliance. We have greater justification in CAD than any other IA office.

(Exhibit 5).

### *No Evidence of Falsification of Timesheets*

DHS OIG did not uncover any evidence of CAD employees falsifying their timesheets, such as claiming AUO for time they did not work. The CAD polygraphers said they did not receive any regular guidance or instruction on AUO, let alone an instruction to falsify their timesheets. Moreover, the Executive Director of Human Resources Operations Program and Policy told us that based on her AUO review, she did not think supervisors told employees to falsify their time. Additionally, in the notes of the management teleconference above, the CAD Director explicitly told the ASAICs to "document the truth."





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Further, there was no reason to falsify any timesheets. CAD managers appeared to sincerely believe that the donut hole complied with AUO regulations and so there was no reason to falsify timesheets to give “the appearance of compliance.” Moreover, we found no reason to doubt the employees who told us that they worked much more than their normal duty hours. CAD’s heavy workload (the collective 900 exam monthly requirement and the individual 12-15 monthly exam requirement) suggests that the polygraphers worked more than 8 hours per day. Even after the introduction of the donut hole, polygraphers had no reason to misreport their overtime because if they were already working the hours, they could meet the three hour requirement by rearranging their schedules. Finally, before the change in 2013-2014, there was apparently so little oversight over AUO forms that employees were not even questioned when they failed to submit the required AUO forms. This is inconsistent with a systemic attempt to falsify timesheets.

At the time, the CBP IA followed two legacy policies from the U.S. Customs Service regarding AUO, Chapter 8 of the *Customs Issuance System Handbook 5300-09* of 1993 and Customs Directive No. 51550-004A of 2000. By manipulating their schedules to maximize the use of AUO, CAD polygraphers violated the first of these documents, which states “Tours of duty should be arranged, as far as practicable, to avoid AUO or other overtime. Irregular or occasional overtime, which is paid for by AUO, should be kept to a minimum for all employees, including supervisors and managers.” The polygraphers did not recall this policy when asked if they received guidance on AUO. However, the CAD Director said that he was familiar with CBP policies, and this may be what was discussed at the May 12, 2014 teleconference where the notes state “Donut hole doesn’t comply with known directives with AUO so we don’t want to promote wrong thinking on AUO. Need to protect AC [Assistant Commissioner] and ourselves to make sure AUO problem doesn’t raise its ugly head in the future.”

Finally, DHS OIG received information showing that by September 2014, CAD employees were all decertified from receiving AUO.

**EXHIBIT  
# 1**

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, February 19, 2014 6:58 PM  
**To:** CAD-ALL-GML  
**Subject:** two-a-days each week

CAD-ALL,

In a meeting [REDACTED] and I had with AC [REDACTED] this afternoon, he wanted me to reiterate the expectation that each field examiner conduct at least two examinations in one day, each week of the month. He agreed that some examiners do not have sufficient applicants at their geographical locations to accomplish this, so they may schedule two-a-days while they are TDY, as long as they accomplish four days during the month in which they conduct two exams on those four days. He suggested that examiners who sometimes conduct examinations on weekends should instead schedule that weekend test during a weekday, so that the extra hours that result would be added to your AUO total hours.

I am expected to provide AC [REDACTED] a report each month that reflects our accomplishments on this.

Thanks,

[REDACTED]

[REDACTED]

Director

Credibility Assessment Division

Office of Internal Affairs

US Customs and Border Protection

[REDACTED]

**EXHIBIT  
# 2**



[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, February 20, 2014 9:57 AM  
**To:** [REDACTED]  
**Subject:** RE: OT request for PP04

Then please deny the OT on the form and send a copy to me. This is exactly what AUO is not supposed to be and why the scrutiny is taking place right. Directing me to work beyond my scheduled hours in advance of one pay period is OT per Dept. of Labor regulations. Nonsense I say.

Please send me the denial on the form.

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**From:** [REDACTED]  
**Sent:** Thursday, February 20, 2014 9:54 AM  
**To:** [REDACTED]  
**Subject:** RE: OT request for PP04

We're not claiming OT for the two-a-days. According to the AC it is AUO.

[REDACTED] ASAIC  
Credibility Assessment Div  
CBP/IA  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, February 20, 2014 9:14 AM  
**To:** [REDACTED]  
**Subject:** OT request for PP04

[REDACTED]

I thought I would get this in for approval before the next pay period starts. As directed by Director [REDACTED] through AC [REDACTED], I have schedule two exams one day each week for PP04 – February 25, 2014 and March 5, 2014.

That will obviously cause me to work in excess of my normal eight hour work day. Since it is directed, and scheduled one pay period in advance, I am submitting the OT request in anticipation of that happening. CAD average is approximately 5 hours per exam – not counting the necessary preparation and finalization of the file to submit timely to QC for the MHC. I estimate about four extra hours during those directed two-a-day exam days, but that number might go up or down depending on how difficult the exam is going that day. Once approved and signed, please scan a copy back for my records. If the time is denied, please send me that information as well, for my records.

Thanks,

[REDACTED]

Special Agent

U.S. Customs and Border Protection

Office of Internal Affairs

Credibility Assessment Division

[REDACTED]

**EXHIBIT**  
**# 3**

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, April 10, 2014 3:46 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Case study in insanity

I don't believe that 'three hour rule' is quite in effect right now, that's why I said I think you will receive your Apr AUO anyway. This is something [REDACTED] is attempting to do to show OCC that we in fact do have the 'three hours face time' at a minimum.

[REDACTED], ASAIC  
Credibility Assessment Div  
CBP/IA  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, April 10, 2014 2:50 PM  
**To:** [REDACTED]  
**Subject:** RE: Case study in insanity

Also, what about the time worked in my situation where I get close to three hours...is that other Admin time OT or COMP or what? It is work that is completed...

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**From:** [REDACTED]  
**Sent:** Thursday, April 10, 2014 2:48 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Case study in insanity

I know you are frustrated, as is everyone. I'm not going to 'tell' you to get that mandatory three hours. If you choose not to so be it. I will report what I receive. I'm assuming, hopefully correctly, that you will receive your Apr AUO anyway. After that your guess is as good as mine.

So will we report 'No' for your ability to get the three hours this week?

[REDACTED], ASAIC  
Credibility Assessment Div  
CBP/IA  
[REDACTED]



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From: [REDACTED]  
Sent: Thursday, April 10, 2014 2:32 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Case study in insanity

[REDACTED]

I JUST kicked my applicant out with an INC NSR NSR result. I have five minutes left in my normal duty hours but have all of the SMART stuff to complete so HQ can get the result. I'm thinking of just not doing any SMART entries until I get an admin day – which is next Thursday - to include the result, because god forbid I do any ADMIN when MAYBE it is or isn't AUO – depending on the rules this week...however, I could have sent the applicant out for an hour lunch while I took a nap, I guess, and then did wrap up and spend another hour plus doing SMART (that might or might not count depending on the magical three number). It is essentially "cooking the books" and waste of my time. I think the insanity has reached maximum levels.

Since I might only get 2.5 hours of "face time AUO" this week and doing the SMART entry today will not count, what should I do? Also, I guess the hour+ I spent at my kitchen counter doing yesterday's SMART won't count either right – how might that compensation work because it will be free labor at <3 face time AUO hours right?

Oh, and you have one minute to respond because my day will be over and my BB doesn't work after that because reading the mail isn't really AUO...

Sorry about the sarcasm...I'm frustrated.

[REDACTED]  
Special Agent  
U.S. Customs and Border Protection  
Office of Internal Affairs  
Credibility Assessment Division  
[REDACTED]

**EXHIBIT**  
**# 4**

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, April 10, 2014 5:28 PM  
**To:** [REDACTED]  
[REDACTED]

**Subject:** AUO/Exam Info

All,

In retrospect I want all of you to stand down regarding some of the information I put out on Tuesday; specifically, regarding running exams. I want each of you to continue scheduling and conducting examinations in the very same manner you have since coming into CAD. Do not change your normal scheduling procedures or exam times, and continue performing the administrative work as you have in the past. If you choose to conduct two exams in one day, that is fine, as long as that has been your typical routine previously. What I don't want is the appearance that our work performance has been altered in any way.

If while conducting your examinations you are in the room with the examinee past your core hours document as we discussed: length of time and case number.

Continue to document your typical AUO work as you have been doing on the 203 form.

Everyone will draw their April AUO in the typical fashion. We will find out about the month of May when HQ informs us of any decisions that have been made. Remember to report tomorrow whether your interview time went beyond your core hours as we discussed. If it did not, simply provide a negative report and document your regular AUO on the 203.

I know everyone is concerned about AUO, namely whether we will continue to earn it or not; and I am just as concerned for you, especially those whose family situations, mortgages, etc. are based on that specific income level. I think it equally important, though, given the number of audits CBP is currently going through that we continue to show consistency in the way we perform and document our duties and workload. We cannot allow our integrity or ethics to be questioned under any circumstances.

I would like everyone to please respond to this email just as soon as you read it. Simply tell me you've read and understand that I want each of us to continue doing business as we have up to now.

[REDACTED]  
Assistant Special Agent-in-Charge  
Credibility Assessment Division  
CBP/IA  
[REDACTED]

**EXHIBIT**  
**# 5**



May 12, 2014

Tele-Con Attendees:

[REDACTED]  
[REDACTED]

- ❖ Director [REDACTED]: [REDACTED] will be taking notes and submitting bullets. ASAICs will use these as talking points during their group meetings.
- ❖ IA newsletter submission due Friday ([REDACTED], have [REDACTED] contact Mr. [REDACTED])
- ❖ Memorial Week in DC for fallen Law Enforcement ([REDACTED] riding). ASAIC [REDACTED] also participating. Remember the fallen!
- ❖ [REDACTED] trying to better coordinate input with MHC, CAD and PSD to help coordinate with field examiners and what goes in their queues
- ❖ Thanks to ASAICs [REDACTED] and [REDACTED] for assisting with Chief [REDACTED] memo objecting to AUO standard
- ❖ Director and (A) Deputy Director are involved in paperwork all this week on AUO issues, working with Chief of Staff, AC signature, to assure Commissioner of eligibility to meet AUO in future. Donut hole doesn't comply with known directives with AUO so we don't want to promote wrong thinking on AUO. Need to protect AC and ourselves to make sure AUO problem doesn't raise its ugly head in the future.
- ❖ ASAICs think about having each of your examiner schedule one exam in the afternoon to ensure 3 hours of in-room AUO.
- ❖ QCs – think about assigning a night duty QC beginning next Monday. Trying to avoid donut-hole spreadsheet. Appreciate ASAICs and examiners doing this data and keep doing in case we have to submit it in the future.
- ❖ Section Chief [REDACTED]: Will be backing out of AUO and let CAD management handle it. Will input occasionally. Spreadsheet may be good for GAO audit. May have to reconstruct if the spreadsheet goes away.
- ❖ Arbitration with NTEU on May 30<sup>th</sup>. [REDACTED] will have minimum number of exams for the next two weeks.
- ❖ CAD policy still in Commissioner's office. Need to change from C1 to AC signature.
- ❖ Notes (talking points) messaging to be consistent throughout CAD. No misunderstandings as all should be on the same page.
- ❖ (A) Deputy Director [REDACTED]: Are [REDACTED] and [REDACTED] both going to school?  
ASAIC [REDACTED]: Response – yes, [REDACTED] is not going until August

- ❖ Ask examiners to of their intent to transfer to IOD if AUO is no longer an issue and CAD gets to keep
- ❖ ASAIC [REDACTED]: QCs for April were just under 100, should have them done within next two days, need drop dead date by Wednesday (will be in Harpers Ferry next two weeks)
- ❖ ASAIC [REDACTED]: good
- ❖ ASAIC [REDACTED] AUO/donut-hole, schedule two a day, later in the day, want all to be on the same page and be able to justify should GAO audit  
Director [REDACTED]: Response - specifics aren't going to fit each examiner, examiners include one exam each week to start in afternoon, will meet the face-to-face time of 3 hours AUO. If leave/training, the examiner should schedule two exams or more for after the normal duty hours. 12 hours in the room with applicant during the month after duty hours in order to support AUO. OCC and HRM will be able to see hours/days/cases that coincide with getting AUO hours. Not sure if it is every pay period, monthly, quarterly, or yearly.  
ASAIC [REDACTED] Response - With regard to the 3 hours of donut hole, a weekly requirement per Section Chief [REDACTED]'s email. Is this still left to interpretation or is it set in stone? If GAO comes in, we need to make sure everything makes matches. Come up with a standard.  
Director [REDACTED] Response – There is no formal plan in place at the moment. There is nothing in writing regarding the 3 hour rule. There will be more discussions later in the week regarding the AUO. Document the truth and make a good faith effort to be in compliance. We have greater justification in CAD than any other IA office.
- ❖ ASAIC [REDACTED]: good
- ❖ ASAIC [REDACTED]: 3 hours a week does not have to be one exam but can be more than one as long as the 3 hours build up
- ❖ ASAIC [REDACTED] (fuzzy): MHC hasn't been producing as much as they should have. New thing, concurrent processing. May be able to process applicants without them going through all MHC steps first.  
Director [REDACTED]: Is there a big pool of hidden applicants in those locations that we aren't able to get in CAD or PSD?  
ASAIC [REDACTED]: Response - no success in getting the applicants in those areas; MHC not changing the way they're doing things
- ❖ ASAIC [REDACTED]: spread out their 2-a-days, they'll definitely get their 3 hours
- ❖ MSS [REDACTED]: Noticed several lines in the comment section of 203 detailing the workload they've done, in detail. Will find sample (Believe it was Irish)

Have a great day!!

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