# **Integrity Committee**



President's Council on Integrity and Efficiency Executive Council on Integrity and Efficiency

935 Pennsylvania Ave., NW, Room 3973 Washington, D.C. 20535-0001 January 22, 2007

The Honorable Clay Johnson, III Chairman, President's & Executive Councils on Integrity and Efficiency c/o United States Office of Management and Budget (OMB) 17<sup>th</sup> Street & Pennsylvania Avenue, N.W., Room 113 Washington, D.C. 20503

Dear Mr. Johnson:

The purpose of this letter is to inform you of the determinations made by the Integrity Committee (IC) at its meeting on December 13, 2006, regarding allegations of misconduct on the part of Inspector General (IG) Robert Cobb, National Aeronautics and Space Administration (NASA). In summary, the IC determined that certain actions on the part of IG Cobb, described in detail below, amounted to an abuse of authority. Other actions taken by IG Cobb were viewed as creating the appearance of a lack of independence and as not adhering to the *Quality Standards for Federal Offices of Inspector General* promulgated by the PCIE and ECIE. I will first outline the procedural history of the case, follow with a discussion of the particular conduct on the part of IG Cobb which the IC found troubling, and conclude with comment about some of the matters raised in the correspondence received from IG Cobb regarding the process.

#### Case Initiation and Investigation

Executive Order (EO) 12993 is the IC's charter for review of allegations of administrative misconduct made against an IG. The EO provides that on receipt of allegations, the IC shall first determine if there is a substantial likelihood that the allegations disclose a violation of any law, rule, or regulation, or gross mismanagement, gross waste of funds, or abuse of authority. If the IC makes this preliminary determination, and further concludes that allegations cannot be referred to an agency of the executive branch with appropriate jurisdiction over the matter, it refers the matter to the IC Chair who is to cause a thorough and timely investigation of allegations to be conducted.

During its meeting on December 12, 2005, the IC reviewed several new complaints against IG Cobb and concluded there was a need for an administrative investigation. The IC also

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reevaluated other allegations regarding IG Cobb that it previously reviewed but which had not been the subject of an investigation. These were reevaluated because the IC wished to consider the full picture and determine whether the pattern of activity disclosed violation of law, rule, or regulation, or amounted to gross mismanagement, gross waste of funds, or abuse of authority. Following the IC decision to initiate the investigation, as IC Chair, I requested the Housing and Urban Development (HUD) Office of Inspector General (OIG) to conduct the investigation.

The IC forwarded complaints received against IG Cobb to the HUD OIG and their investigators organized the case into 79 separate allegations. The HUD OIG conducted a thorough investigation of 69 allegations and submitted its Report of Investigation (ROI) to the IC on August 30, 2006. The remaining 10 allegations were not investigated by the HUD OIG based on their conclusion that the information supporting the allegations was too vague or insufficient to justify continuing the inquiry. The IC concurred with that assessment. The ROI prepared by the HUD OIG is enclosed for your review. IG Cobb cooperated with this investigation and was interviewed, with legal counsel present, by HUD OIG investigators for more than ten hours during sessions on June 27 and 29, 2006. At the conclusion of his interview, IG Cobb was allowed to both review and supplement his deposition. The IC also received correspondence from IG Cobb during its review of the matter that is also enclosed for your review.

# Integrity Committee Review of the Report of Investigation

Over the course of three IC meetings, the allegations and the HUD OIG ROI were reviewed and discussed. Utilizing the ROI, the IC placed the allegations in four categories, as follows:

- 1. Abusive work environment
- 2. Lack of independence
- 3. Audit Division reorganization
- 4. Other Matters

The identifying numbers used below are those assigned to the allegations by the HUD OIG. They are referred to in this letter as a matter of convenience but have no other significance.

#### Abusive Work Environment

The IC evaluated nine allegations, appearing as numbers 52, 53, 57, 58, 59, 60, 61, 62, and 63 in the ROI, which fell under the broad category of abusive work environment. The IC determined that "abusive work environment" fit under the EO for jurisdiction purposes through the "abuse of authority" clause. The term "abuse of authority" is defined in the IC Policies and Procedures as:

arbitrary or capricious exercise of power by a federal official or employee that adversely affects the rights of any person or that results in personal gain or

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advantage to himself or to preferred other persons. There is no de minimis standard for abuse of authority.

Allegation 53 was made by:

allegations are confirmed by interviews of two witnesses. According to the ROI, IG Cobb berated the using a loud and nasty tone that included profanity in front of the to the point of causing tears and her departure from the meeting. When the staff member returned to the meeting at which this occurred, she informed IG Cobb that profanity in the workplace was not acceptable; IG Cobb did not apologize for his behavior. On other occasions, he screamed at the same individual over the issuance of a search warrant and called the staff member's work a "fucking piece of shit" as he slammed his fist on the table next to the staff member. A witness confirms that IG Cobb's tone and treatment of

was condescending, berating, and demeaning. IG Cobb's treatment of was similar in that he routinely yelled and screamed at the individual as part of disagreements on positions taken by the individual in investigative matters.

Three other witnesses confirm IG Cobb's habitual use of profanity in the office while another, confirms that IG Cobb referred to his staff as "fucksticks." According to the witness, under IG Cobb there were constant threats and intimidations creating in the witness' view a "hostile work place." Another witness describes IG's Cobb's lack of respect for NASA OIG employees by his referring to Special Agents in the field as "knuckle draggers." According to this senior employee, morale among NASA OIG staff was "horrible."

IG Cobb confirmed use of the F-word in his office and indicated he is "passionate when people are insubordinate to my face," but denies, "cursing" at employees.

The IC determined IG Cobb engaged in an abuse of authority as defined by the EO. IG Cobb's treatment of detailed in allegation 53 was inconsistent with the high standards of conduct expected of senior executives. The IC viewed this conduct as more than an aggressive management style or a way of expressing dissatisfaction with employee performance but as arbitrary or capricious conduct, which affected the rights of senior employees to a non-hostile and abusive workplace.

The IC further determined that other conduct on the part of IC Cobb, as described in allegations 59 and 61 did occur. This conduct involved regular belittlement of the audit staff and putting his feet on the desk in the face of those sitting opposite as a sign of disrespect. The IC further determined the conduct did not rise to a level of abuse of authority.

## Lack of Independence

The IC considered eighteen allegations, appearing as numbers 9, 10, 28, 29, 30, 31, 32, 34, 35, 37, 47, 48, 49, 50, 51, 66, 67, and 68 in the ROI, which fell under the broad category of lack of



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independence. The starting point for the IC's analysis is EO 12805 which established the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE). Section 3(c) of the EO provides that "[t] he individual members of the Councils should, to the extent permitted under law, adhere to the professional standards developed by the Councils and participate in the plans, programs, and projects of the Councils."

In October 2003, the PCIE and ECIE promulgated the <u>Ouality Standards for Federal</u> <u>Offices of Inspector General</u>, which sets out quality standards for the management, operation, and conduct of the Federal Offices of Inspector General. Section II.A. of the <u>Ouality Standards</u> establishes general standards for ethics, independence, and confidentiality, indicating that "[i]ndependence is a critical element of objectivity. Without independence, both in fact and in appearance, objectivity is impaired." Section II.C. describes the independence standard with more detail:

"The Inspector General and OIG staff must be free both in fact and appearance from personal, external, and organizational impairments to independence. The Inspector General and OIG staff have a responsibility to maintain independence, so that opinions, conclusions, judgments, and recommendations will be impartial and will be viewed as impartial by knowledgeable third parties. The Inspector General and OIG staff should avoid situations that could lead reasonable third parties with knowledge of the relevant facts and circumstances to conclude that the OIG is not able to maintain independence in conducting its work."

Six of the eighteen allegations within the subset labeled as "lack of independence" indicate that IG Cobb sought to develop and maintain a close relationship with former NASA Administrator Sean O'Keefe and that this effort contributed to an appearance that his independence was being compromised. The ROI and IG Cobb's interview documents these efforts:

- IG Cobb frequently joined Administrator O'Keefe in lunches intended for senior staff at NASA Headquarters
- IG Cobb played golf on two occasions with Administrator O'Keefe.
- IG Cobb used the NASA aircraft for official travel on several occasions when Administrator O'Keefe was also traveling.
- IG Cobb referred to the Administrator as "his boss.
- IG Cobb sought guidance from Administrator O'Keefe on the audit design for at least two audits.
- IG Cobb sought Administrator O'Keefe's review of a draft OIG opinion regarding the independence of the Columbia Accident Investigation Board.
- IG Cobb advised Administrator O'Keefe about search warrants to be issued in a significant criminal investigation before those search warrants were executed.

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An IG is required to keep the head of the agency fully and currently informed about fraud and other serious problems, abuses, or deficiencies relating to the programs and operations administered or financed by the agency. He has a responsibility to communicate with the Administrator. IG Cobb concedes his activities and responds that he has a "collaborative approach" with senior management and specifically agrees with the policy laid out by Administrator O'Keefe that an OIG has an opportunity to add value to an organization. None of these instances, standing alone, is sufficient to create an "appearance" problem, but it is the responsibility of the IG to consider how the combined affect of his interaction with the Agency head might cloud or be perceived to cloud his independence. Against this backdrop, the IC found two specific allegations warranting its detailed comment.

The fact pattern of allegation 28 involved a June 2002 computer intrusion and theft of International Traffic in Arms Regulation (ITAR) designated files from a NASA server worth about \$1.9 billion. The matter was brought to the attention of NASA by a news reporter. The theft of ITAR data must be reported to the State Department. The HUD OIG investigation revealed the primary responsibility to report the theft/compromise of ITAR data was the responsibility of NASA's Office of Security and Program Protection, known as "Code X." However, the investigation revealed that IG Cobb was aware that Code X was not reporting the theft/compromise and IG Cobb took no action to ensure the reporting was made to the State Department. The complainant believes that IG Cobb failed to report the matter to the Department of State and the Congress to avoid embarrassment for NASA management.

Two witnesses, one of whom was opined that if the appropriate NASA entity failed to report the loss, the reporting requirement would fall onto whoever had oversight over NASA, which would include the OIG. Under an OIG's oversight role, IG Cobb should have recognized Code X's misinterpretation of the reporting requirement and ensured that the proper parties were alerted. This is incumbent upon the IG by virtue of his position. Both witnesses questioned the independence of IG Cobb's decision to not report the theft/comprise or work to ensure Code X reported the theft/compromise. One of the witnesses opined that IG Cobb prevented the reporting of the matter because he was attempting to prevent public disclosure that would have embarrassed NASA. Another witness said IG Cobb viewed Code X as a "source of grief' and that the easiest way to handle matters involving Code X was to "acquiesce" to the Code X Director. Another senior NASA OIG official prepared a Memorandum for Record (MFR), dated 02/23/2006, concerning the ITAR matter. The MFR states in part,

It took over a year for the loss [referring to the Marshall Space Flight Center case] to be assessed by DOD, who opined the stolen ITAR had national security implications (no further information). For whatever reason, NASA senior management [Code X] failed to report the loss. By definition and purpose the OIG's oversight role, the IG [Cobb] should have recognized the Code X's misinterpretation and misplaced emphasis and ensured the proper parties were alerted. Even after being coached by experienced OIG staff, the IG failed to act.

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IG Cobb said he directed his staff to prepare a report regarding the compromise that was sent to the Marshall Space Flight Center and a copy provided to NASA management in April 2003. In his supplemental letter IG Cobb indicates that any delay in preparing that report was a result of his insistence that the NASA OIG staff do the grinding work to produce an accurate and relevant report. IG Cobb maintains that there was no clear legal requirement for the loss to be reported to the Department of State by Code X and that the matter was discussed informally with the Department of State upon learning of the intrusion.

Allegation 35 involves IG Cobb's actions in the investigation of an alleged theft of jewelry from the remains of a Columbia Space Shuttle Astronaut. The Columbia space shuttle exploded on February 1, 2003, during re-entry to the earth's atmosphere. The explosion initiated over Texas en route to the planned landing at Kennedy Space Center. The remains of deceased Astronaut Laurel Clark were recovered shortly after the Columbia accident and a ring was allegedly present on, and then stolen from, her recovered remains. NASA OIG, in partnership with the Texas Rangers, pursued a joint investigation into the theft. As part of the investigative process, the Texas Rangers planned to release a "Crime Stoppers Report" to the public to assist in the recovery of the stolen ring.

the deceased Astronaut, and a NASA employee, supported the request for public assistance to find his wife's ring. said he met personally with IG Cobb who told him he would not issue a report on the investigation of the stolen ring. The meeting was tape recorded by ... At one point during the meeting, IG Cobb asked to turn off the tape recorder. According to IG Cobb said the whole NASA Columbia investigation was not going well, NASA wanted it finished, and for the outcome to reveal nothing that would make NASA look bad or would shake the public's trust in NASA.

Two witnesses interviewed by the HUD OIG suggest that IG Cobb inserted himself in the investigation with the intent of ensuring NASA would not be embarrassed.

states that when IG Cobb saw the Crime Stoppers Report, he (IG Cobb) went "ballistic." He recalled that IG Cobb, when discussing the report, stated, "how can you even think of allowing this to go out" and "I am going to have to resign if this report gets out." stated that at the time he did not understand IG Cobb's response, but later learned that NASA Administrator O'Keefe instructed everyone at NASA not to contact any Astronaut or their families. He opined that IG Cobb believed O'Keefe was his "boss" and IG Cobb would do whatever O'Keefe wanted.

Another NASA employee who requests confidentiality recalls IG Cobb saying, "Can you believe how embarrassing that would have looked for the agency [NASA] if that [crime stoppers report] went out?" The Texas Ranger involved in the investigation informed HUD OIG that he believed that someone at NASA wanted the investigation shut down because if it got out that the ring was stolen, questions would be asked as to the conduct of the whole NASA investigation into



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the Columbia accident.

IG Cobb responds that the decision he made regarding the matter was that his office needed to conduct additional investigation to see if what was articulated in the draft crime stopper notice was right or wrong. He questioned the evidence that was being relied on to conclude that a ring had been stolen and directed further investigation be conducted before consenting to NASA OIG involvement in issuance of any public notice of a criminal act. In IG Cobb's view, publication of the notice based on the information would have been irresponsible. IG Cobb evaluated the evidence as not supporting the contention that the ring was stolen from recovered remains but was lost along with millions of pieces of Columbia and all other personal affects of the astronauts over thousands of miles of Texas and Louisiana.

The IC determined that neither allegation 28 or 35 substantiated an actual lack of independence on the part of IG Cobb that could be characterized as gross mismanagement, gross waste of funds, abuse of authority, or a violation of any law, rule, or regulation under EO 12993. The facts set out in allegations 28 and 35 did substantiate two specific instances in which IG Cobb's performance caused the appearance of a lack of independence not in keeping with the Quality Standards for Federal Offices of Inspector General. IG Cobb's decision not to act to ensure the ITAR theft/compromise was reported in a timely manner created the appearance of lack of independence. This determination augments the IC's review of the matter in 2004 in which it relied only on the allegation and a response from IG Cobb. In that review the IC determined that IG Cobb had not engaged in any wrongdoing. In addition, IG Cobb's actions associated with allegation 35, including his statements to and a confidential witness, created the appearance of lack of independence not in keeping with the *Quality Standards for* Federal Offices of Inspector General. While the Quality Standards do not have status of law, rule, or regulation, the IC views these standards as a benchmark for IG performance and applicable to all IGs through EO 12805, Integrity and Efficiency in Federal Programs.

## Audit Division Reorganization

The IC considered six allegations, appearing as numbers 12, 14, 15, 17 18, and 19 in the ROI, concerning IG Cobb's handling of audits and staffing for the auditing function of the OIG. The thrust of these allegations was that IG Cobb reorganized the office several times, decreased the number of audit reports and changed their format making it difficult for auditors to know which format to follow, and generally slowed the audit reporting process to a substantial degree. IG Cobb's actions were within the discretion of an IG. The IC determined that the ROI did not substantiate actions by IG Cobb that amounted to gross mismanagement, gross waste of funds, abuse of authority, or a violation of any law, rule or regulation as it relates to his handling of audit division reorganization matters.



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#### Other Matters

The IC placed all remaining allegations in a general category referred to as "Other." In its review of these allegations, the IC determined that they were not substantiated by information in the ROI, indicated no wrongdoing by IG Cobb, were outside the purview of the IC, or did not warrant further investigation. It is important to note that within this category there were some allegations involving whistleblower retaliation which is an area outside the purview of the IC. The whistleblower retaliation allegations were referred to the Office of Special Counsel, the agency with the appropriate authority to conduct inquiries on such matters.

#### Conclusion

The IC concludes that IG Cobb engaged in abuse of authority as an Inspector General by creating an abusive work environment. In addition, IG Cobb's actions created an appearance of a lack of independence outside the quality standards expected of an IG when he did not report the theft of NASA ITAR files and prevented the dissemination of a Crime Stoppers Report.

#### Issues of Due Process

During the course of the IC inquiry, IG Cobb expressed dissatisfaction with the IC process in multiple letters. He questioned the methodology by which IC directed an investigation, the degree of due process for him in that methodology, his inability to review the report prepared by the HUD OIG before it was presented to the IC, and what he perceives as a lack of fairness to him during the course of the investigation and the IC review.

The decision to investigate was made by the IC. IG Cobb received notice that an outside investigation would ensue. The letter did not purport to identify all of the matters to be investigated, but as IG Cobb was later informed, this letter was not intended to limit the authority of the IC to review other allegations of wrongdoing. IG Cobb was generally cognizant of the matters under investigation and answered extensively in the questioning during his interview. He was provided a copy of his interview transcript and given the opportunity to comment on the accuracy of the transcription or submit additional matters for consideration by the IC prior to IC's review of the report. His interview regarding allegations 28, 35, and 53 was extensive and he responded with seemingly clear knowledge of the matters about which he was being questioned.

In subsequent correspondence to the IC, IG Cobb did not question the accuracy of the transcription and did submit additional matters to the IC that went to the substance of allegations. IG Cobb's materials dealt generally with the matter of lack of independence and specifically with the substance of allegations 28 and 35, the compromise of ITAR data and Astronaut Clark's missing ring respectively. The additional information submitted by IG Cobb was provided to IC members shortly after it was received. While IG Cobb may not have been sent a letter detailing the specific allegations being investigated, he was more than able to respond to the allegations which

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ultimately form the basis for the IC's determinations in this case. IG Cobb also offered the names of witnesses to be interviewed by the HUD OIG and later suggested questions for those interviews. Some of those individuals had been interviewed by the HUD OIG but others, including many from outside the agency, were not.

IG Cobb did not receive a copy of the ROI prepared by the HUD OIG at the conclusion of the investigation under the Policy and Procedures of the IC. The ROI is available to him under the Privacy Act and implementing regulations of the Department of Justice. He has already submitted a request for the ROI which will be provided to him through that mechanism. The copy he receives will be redacted of personal information and other information as allowed by the Privacy Act and implementing regulations.

IG Cobb will be notified that the IC has concluded its review and is forwarding the matter for your consideration. He has not been informed about the IC's determinations or provided a copy of this letter.

## Outside Inquiries

The IC has received both media inquiries and congressional inquiries concerning this investigation. As part of the PCIE/ECIE, the IC considers its review a component of the overall process over which you, as Chairman, have ultimate authority. Neither the IC, nor its members will provide any information or briefing on this matter unless it is specifically approved by your office. Until advised otherwise, as IC Chair, I will refer all media and congressional requests on this matter to your office.

Please contact me if I can be of any further assistance in this matter.

Sincerely,

James H. Burrus, Jr. Chair, Integrity Committee

Enclosures (3)



# EXECUTIVE OFFICE OF THE PRESIDENT OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, D.C. 20503

DEPUTY DIRECTOR FOR MANAGEMENT

February 15, 2007

The Honorable Michael Griffin Administrator Two Independence Square, 300 E Street, SW Room 9F44 Washington, DC 20546

Dear Dr. Griffin:

I am forwarding to you a copy of the Report of Investigation (IC Case Number 500) regarding allegations of misconduct on the part of NASA Inspector General Robert Cobb (IG) with a summary from James Burrus, Chairman of the President's Council on Integrity and Efficiency (PCIE) Integrity Committee. For your information, Mr. Burrus, is providing IG Cobb a redacted copy of this same report in response to his request for a copy.

You should consider the appropriate action to take in response to the report's conclusions, summarized on page 8 of the report. As set forth in Executive Order 12993, Section 4, Part D, and clarified in the IC's 'Policies and Procedures' (attached), you have thirty days to certify to me that you have reviewed the report and let me know what actions, if any, you plan to take. You also have the right to request a thirty day extension if extra time is deemed necessary.

Finally, when the investigation process is complete, after the Integrity Committee advises the subject of the investigation that the matter has been closed, determine how most appropriately to brief interested members of Congress on this report. Please use James Burrus to forward a copy of the report to the desired members of Congress, as he knows what information in the report must be redacted to comply with confidentiality or privacy requirements.

Sincerely,

Clay Johnson

CC: James Burrus, Chairman, Integrity Committee, President's Council on Integrity and Efficiency

National Aeronautics and Space Administration Office of the Administrator Washington, DC 20546-0001



March 14, 2007

The Honorable Clay Johnson III
Chairman
President's and Executive Councils on Integrity and Efficiency
c/o United States Office of Management and Budget
17<sup>th</sup> Street and Pennsylvania Avenue, N.W., Room 113
Washington, D. C. 20503

Dear Mr. Johnson,

I am writing in response to your letter of February 15, 2007, forwarding both a copy of the Report of Investigation (ROI), IC Case Number 500, regarding allegations of misconduct on the part of NASA Inspector General Robert Cobb, and the investigative summary by Mr. James Burrus, Chairman of the President's Council on Integrity and Efficiency (PCIE) Integrity Committee (IC). Pursuant to the requirements of Executive Order 12993, I certify that I have reviewed the report.

In light of my review of the record and your instructions in the transmittal letter, I propose the following actions:

- I will meet with Mr. Cobb and review the ROI and the IC's conclusions.
- I will provide a letter of instruction (draft enclosed) to Mr. Cobb setting out the following actions:
  - O I will require, with your concurrence as Chairperson of the PCIE/ECIE, Mr. Cobb's attendance, at the earliest possible time, at an appropriate resident course at the Federal Executive Institute (FEI) where he will be assisted in developing an individual leadership and management training plan. Additionally, I will, with your concurrence, arrange for the services of an Executive Coach to assist Mr. Cobb over the next year to further enhance his leadership and management skills.
  - o I will require, again with your concurrence, that Mr. Cobb attend at least one management/leadership resident course at FEI, or an equivalent facility, each year that he remains under my general supervision.
  - o I will direct that he meet with the Deputy Administrator on a bi-monthly basis to discuss his implementation of his individual leadership/management plan and his professional growth with the Executive Coach.

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• Upon the completion of the actions described above, I will schedule a meeting with the employees of the NASA Office of Inspector General to inform them that I have reviewed the ROI and I have taken the actions that I believe are necessary to address the ROI's findings. Such a meeting will provide me an opportunity to listen to any concerns that may exist among the staff and to express my support for a strong and effective Office of Inspector General.

I believe that the above actions will address any concerns I have after having reviewed the ROI.

This has been a trying year for Mr. Cobb and I have been impressed with his continued focus on his professional obligations to the Congress and to this Agency. I also would note that the ROI does not contain evidence of a lack of integrity on the part of Mr. Cobb, nor is there support in the ROI for any actual conflict of interest or actual lack of independence on his part.

Sincerely,

Michael D. Griffin Administrator

# **Integrity Committee**



President's Council on Integrity and Efficiency Executive Council on Integrity and Efficiency

935 Pennsylvania Ave., NW, Room 3973 Washington, D.C. 20535-0001

March 20, 2007

The Honorable Clay Johnson, III Chairman, President's and Executive Councils on Integrity and Efficiency c/o United States Office of Management and Budget 17<sup>th</sup> Street & Pennsylvania Avenue, N.W., Room 113 Washington, D.C. 20503

Dear Mr. Johnson,

The Integrity Committee of the Presidents Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE), met on March 20, 2007 regarding your letter, dated March 14, 2007 concerning the National Aeronautics and Space Administration (NASA), Inspector General (IG), Robert E. Cobb.

Pursuant to the Policy and Procedures for Exercising the Authority of the Integrity Committee of the PCIE, Section 5(d)(2), dated November 5, 2004, the Integrity Committee has no authority to compel any particular action, but has a responsibility to advise you of concerns we may have regarding the proposed action. All members of the committee believed the proposed course of action recommended by the Administrator of NASA was inadequate to address the conduct of IG Cobb. All members of the committee further believed that disciplinary action up to and including removal, could be appropriate.

Sincerely,

James H. Burrus, Jr. Chair, Integrity Committee

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