



Homeland
Security

FEDERAL LAW ENFORCEMENT TRAINING CENTERS



ARTESIA, NM ★ CHARLESTON, SC ★ CHELTENHAM, MD ★ GLYNCO, GA
GABORONE, BOTSWANA ★ BANGKOK, THAILAND

Disability Access Plan for Public-Facing Programs and Activities (Non-Employment)

October 2019

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Federal Law Enforcement Training Centers (FLETC)

Disability Access Plan for Public-Facing Programs and Activities (Non-Employment)

I. Introduction

This Plan sets forth the methodology used by Federal Law Enforcement Training Centers (FLETC) to implement the Department of Homeland Security (DHS), Directive 065-01, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)* issued on September 25, 2013, and its accompanying DHS Instruction 065-01-001, issued on March 13, 2015. The DHS Directive and Instruction aim to strengthen Component compliance with the requirements of Title 6 of the Code of Federal Regulations Part 15, Sections 504 and 508 of the Rehabilitation Act of 1973 and related laws.

Sections 504 and 508 require FLETC to ensure individuals with disabilities are not offered lesser, segregated, or different programs and activities than those offered to other members of the general public. Moreover, Section 504 requires that accessibility and reasonable modifications be provided to individuals with disabilities, when requested, to allow them to participate fully in FLETC conducted public-facing programs and activities. Section 508 requires that materials available in electronic format are as accessible and usable by members of the public with disabilities as other members of the public without disabilities.

This three-phase general methodology plan is expected to ensure that FLETC's public-facing programs and activities are universally accessible to individuals with disabilities at the FLETC Glynco Headquarters and the three FLETC Training Delivery Points (TDPs) in Artesia NM, Charleston SC, and Cheltenham MD.

II. Executive Summary

FLETC conducted its Self-Evaluation pursuant to DHS Directive 065-01 and the accompanying Instruction 065-01-001, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*, between August 2017 and June 2018. FLETC utilized the Self-Evaluation Tool contained within the Component Self-Evaluation and Planning Reference Guide to conduct interactive discussions with staff from all the Directorates within FLETC. Teams from Facilities Management Division, Environmental and Safety Division, and Regional and International Training Directorate (RITD) conducted physical assessments in each of the four FLETC sites. The teams used an assessment form developed by the Equal Employment Office (EEO) to conduct those assessments. They determined major elements in physical structures that would need potential repair or rehabilitation to bring those physical structures up to the required Architectural Barriers Act Accessibility Standards (ABAAS). FLETC leases the FLETC Washington D.C. Office. It is an office within a commercial building owned by the General Services Administration (GSA) and was not assessed.

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The results of these assessments are included in Appendix A, and include estimated time frames for completion associated with any repair or rehabilitation which may be required. FLETC's Facilities Board meets annually with FLETC Site Directors, Deputy Assistant Directors, and Assistant Directors to discuss the Operations & Support (O&S) projects for each new fiscal year. The projects listed in Appendix A will be listed as priority #1 projects to ensure they are funded in their respective years, based on anticipated funding. When funding is received, the POC will track the status of the project. Upon completion of the project, the POC will notify EEO and FMD.

With regard to any gaps in FLETC's programmatic accessibility, although the Self-Evaluation initially identified the need to develop a standardized accommodation process to address the accessibility needs of members of the public who have disabilities, subsequent assessment and experience revealed that public programmatic interface occurs rarely, and current coordination with EEO meets the needs of visitors.

Many of the issues identified in the Self-Evaluation will require minor adjustments to resolve issues. Currently, FLETC's Protocol and Communications Office (PCO) designed and utilizes a standard statement on all public invitations which states that individuals need to contact the PCO prior to the event to ensure that accessibility accommodation is in place and available. PCO is updating FLETC's internet website to notify individuals who come to FLETC with whom to file a complaint if they feel discriminated against based on a disability. Additionally, PCO will assess the need to create Standard Operating Procedures (SOP) for all staff to utilize when hosting any public events.

The Self-Evaluation revealed that FLETC's Chief Information Office maintains, via Office of Accessible Systems and Technology (OAST), a regular reporting system. FLETC is current and up-to-date on all required 508 compliance measures.

The Self-Evaluation process brought forth a primary issue of physical access and resulting identification of physical structures that need repairs or rehabilitation. Programmatic access has not been an issue to date.

III. FLETC Overview

FLETC is a technical training school for law enforcement professionals. Currently, approximately 100 federal agencies, and many more state and local organizations, rely on FLETC for all or some of their law enforcement training. Since its establishment in 1970, FLETC has provided training in subjects integral to the performance of law enforcement functions across the Federal Government, such as firearms, driving, tactics, investigations, and legal training. FLETC also enables federal participating organizations to deliver training unique to their missions at FLETC training sites.

Through strategic partnerships, FLETC prepares the federal law enforcement community to safeguard the American people, our homeland, and our values. To execute this mission, FLETC serves three enterprise-level roles – producer, resource, and steward. FLETC produces law enforcement training, products, services, systems, research, infrastructure, and expertise to meet the operational needs of federal law enforcement personnel. As a resource,

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FLETC provides access to what it produces to state, local, tribal, private, and international law enforcement stakeholders. As a steward, FLETC is the U.S. Government's executive agent for the federal resources allocated for the basic training of law enforcement personnel among FLETC's federal participating agencies. Effectively performing its functions - as producer, resource, and steward - positions FLETC to achieve its vision to be the Nation's enterprise resource for federal law enforcement training.

FLETC was founded with two complementary goals: to develop and establish consistency in the content and delivery of federal law enforcement training; and to leverage the advantages of a centrally managed, universally accessible training infrastructure.

Headquartered in Glynco, Georgia, FLETC and its federal participating organizations annually train upwards of 60,000 students in four training delivery sites occupying 3,300 acres in New Mexico, South Carolina, Maryland, and Georgia. A typical day will find FLETC staff and law enforcement agency staff actively engaged in delivering, exercising, and evaluating the transfer of critical law enforcement knowledge and skills for 3,000 students, most of whom are in-residence at a FLETC training delivery point.

FLETC's strategic plan envisions FLETC as a national resource for law enforcement training and commits FLETC to a course of continuous cooperation and collaboration with its clients, while balancing the equities of all stakeholders in administering its training programs.

In addition to basic training, FLETC leverages the expertise of its training partners to offer the most comprehensive inventory of specialized and advanced training programs in law enforcement. State, local, and tribal law enforcement personnel are an integral part of the homeland security community. As a resource to them, FLETC provides specialized and advanced training at its training sites and exports training programs to state, local, and tribal agencies throughout the country. FLETC serves DHS's international mission through participation and leadership in the International Law Enforcement Academies in Botswana, El Salvador, Thailand, Hungary, and New Mexico. FLETC provides training and capacity-building activities overseas, hosting international law enforcement personnel at FLETC's domestic training sites, and engaging with international stakeholders in research and the exchange of best practices and subject matter expertise.

In addition to training, FLETC has become a powerful force for interagency collaboration and a repository for the accumulated experience and expertise of the federal law enforcement community it serves. Over its nearly 50 years of continuous operation, FLETC has become a career convergence point for federal law enforcement practitioners. Most federal officers attend an entry-level, basic officer training program at FLETC early in their careers, and, over the course of their careers, attend several advanced training programs. Many former students return to FLETC as instructors for their agency for multi-year assignments, some former students join FLETC as permanent staff, and some join FLETC after completing their agency career.

Today and every day, tens of thousands of federal law enforcement personnel, armed with the training they received at FLETC, anticipate, prevent and respond to events endangering our Nation's people, property, and institutions. Throughout the homeland and abroad, former FLETC students, now U.S. agents, officers, investigators, inspectors, and screeners, assess,

plan, patrol, inspect, examine, apprehend, investigate, interview, and perform thousands of other specialized tasks as they contribute to fulfilling their agencies' missions.

FLETC ensures that its Disability Access Program is integrated with and enables its mission work through the combined efforts of the following Divisions:

- The Equal Employment Opportunity (EEO) Office has primary responsibility for the Disability Program for applicants, employees, and students within FLETC, and provides technical guidance as it relates to disability access for the public.
- The Human Capital Office (HCO) is responsible for recruiting professionals and for supporting continuous learning to strengthen various professions' core competencies in support of the FLETC mission. The HCO also ensures FLETC is aware of the disability access needs of the applicants.
- The PCO ensures FLETC is aware of the disability access needs of FLETC and our Partner Organizations' visitors, students, staff, and applicants.
- The Procurement Division provides and performs acquisition, lease negotiations and management.
- The Facilities Management Division performs facility management, construction management, repair and alteration, facility modernization, and real property management.
- The Chief Information Officer's Directorate provides for the installation of all IT and communications equipment and ensures FLETC is 508 compliant.
- The Environmental and Safety Division establishes environmental and safety programs in support of all disability access programs and activities.
- The Budget and the Finance Divisions perform budgetary, accounting, and disbursement functions in support of the Disability Access Program.
- Security services for the Partner Organizations, occupants, tenants, and visitors of FLETC are provided by contract. FLETC provides these services so our Partner Organizations and front line employees can focus on their core missions and deliver law enforcement training programs and support services to their students in a timely and cost efficient manner.

IV. FLETC's Plan to Address Barriers and Gaps

1. Scope.

This Plan encompasses a fluid seven-year Self-Evaluation of the public-facing programs at FLETC Glynco Headquarters, and the three FLETC TDPs in Artesia, New Mexico; Charleston, South Carolina; and Cheltenham, Maryland. The Self-Evaluation identified structural barriers for individuals with disabilities in FLETC's public-facing programs and FLETC developed a compliance plan.

Public-facing programs performed by FLETC staff or by contractors on behalf of FLETC are included in the Self-Evaluation.

The Plan includes facilities where known concerns have been identified and where the needs are most apparent.

FLETC's primary function is that of a consolidated service provider of basic and advanced law enforcement training programs. FLETC will address the Customer Service and Security Activity requirements as stated in DHS Directive 065-01-001, Parts A, B, and C and within Civil Rights Civil Liberties (CRCL) Guidance for Developing the Component Plan. FLETC does not participate in any Custody Activity; therefore, that section is not applicable. Further, the Plan will not address programs, offices, and facilities related to reasonable accommodation for applicants, employees, and students currently covered by the formalized FLETC Reasonable Accommodation process.

2. Responsibilities.

- 2.1. FLETC EEO Officer, John C. Weaver, will serve as the Liaison to the FLETC Director's Office during the implementation of the content and procedures of this Plan, which covers FLETC- conducted public-facing programs and activities.
- 2.2. The Disability Access Coordinator (DAC) served as the Project Manager for the Self-Evaluation, led the FLETC Disability Access Team through the Self-Evaluation process, participated in DHS meetings regarding the self-assessment, and completed DHS reporting requirements. The EEO Disability Program Manager will serve as DAC and coordinate FLETC compliance with the Plan.
- 2.3. FLETC currently has at all sites a variety of effective communication elements and devices. FLETC coordinates with the Department of Defense (DoD) Computer/Electronic Accommodations Program (CAP) to receive equipment both for Reasonable Accommodation and for accessibility features for all FLETC sites. Equipment at each FLETC site includes assisted listening devices, Ubi-Duo face-to-face communication devices, and all video equipment with captioning capability. The areas of effective communication include:
 - a. Internet
 - b. Intranet
 - c. Social media
 - d. Voicemail
 - e. Dialogue during tours
 - f. Webcasts and podcasts
 - g. Online and export training. Public-facing communication, when training is offsite, will have to be evaluated to ensure that a variety of communication techniques/devices are readily available whenever needed.
 - h. Emergency communications

3. The Disability Access Team will apply the Plan to all areas of access and opportunity for participation by individuals with disabilities in FLETC's public-facing programs and activities. The Disability Access Team will work with the Facilities Planning Board and technical advisors and support staff members as necessary to estimate repair costs, and will develop a timeline to meet compliance. The Disability Access Team members were appointed for each FLETC TDP. The Disability Access Team members for each site are:

3.1. Glynco – John Weaver, EEO Officer, EEO Division, Director's Office

3.2. Charleston – Mark Boswell, Chief, Administration Division, Office of Charleston Operations, TMO

3.3. Cheltenham – James Tabb, Chief, Cheltenham Administration Division, Office of Cheltenham Operations, NCR

3.4. Artesia – DeAnne Connelly, Lead Facilities Project Manager, Artesia Administrative Division, Office of Artesia Operations, CTO

3.5.

4. Technical Advisors and Support Staff Members will supplement the Disability Access Team on an ad-hoc basis to provide technical guidance regarding FLETC programs, policies, and activities. Additional members may be an individual or group of individuals from any of FLETC's Directorates and Program Offices.

5. Evaluation Approach. The DHS Guide 065-01-001 guided the Disability Access Team through the assessment process with the goal of revealing how well FLETC provides access to individuals with disabilities within its programs and activities. In addition, the DAC and the EEO Officer developed a form for assessing physical structures used by all Disability Access Team members in completing their assessments.

5.1. Phase 1 – The Assessment Phase included performing a self-assessment of all public-facing programs and activities and identifying barriers to access posed by existing policies, communication mechanisms, and physical spaces. This phase concluded in the identification of areas requiring strengthening and development of a compliance plan to address barriers to access. *(Completed June 2018)*

5.2. Phase 2 – The Implementation Phase.

FLETC Glynco has the most facilities requiring repairs or modifications to improve accessibility. It is anticipated that repairs to public facing buildings will be prioritized on the basis of frequency of use by the public. Therefore, focus will be primarily on the main security building where all non-FLETC staff must visit in order to be allowed on Center, and the main auditorium where events attended by the public are held. Certain training venues that are likely to be part of a tour may be given the next level of priority, and the lowest priority will be given to facilities

with infrequent public visitors. Facilities at the other training sites requiring repairs are included in Appendix A.

- 5.3. Phase 3 – The Monitoring Phase will include methods for monitoring and measurements of individual issues or elements and assignment of staff responsibilities to ensure compliance. The monitoring phase will include continual periodic assessment of programs, policies and physical spaces. The Plan will be updated to assess current and new programs, policies, and physical spaces to enable accessibility and equal opportunity participation for people with disabilities in all FLETC public-facing programs.
6. Areas of Access and Opportunity in Public-Facing Programs. Since FLETC’s mission relates to serving the training needs of law enforcement partner organizations, FLETC public contact is very limited. Although FLETC has few public visitors, FLETC is committed to making facilities that host the public, accessible to the individuals with disabilities. Generally, public contact at FLETC facilities includes the following:
 - 6.1. Accessibility of Program, Policies, and Practices:
 - a. Graduation ceremonies
 - b. Conferences
 - c. Special Events open by invitation
 - d. Special Emphasis Programs
 - e. Outreach and Recruitment events. FLETC hosts various programs throughout any given year, which could include activities such as recruitment events, career fairs, Special Olympics competitions, Peace Officers Memorial Ceremony, Bureau of Indian Affairs Memorial, Veterans Day, Take Your Child to Work Day, FLETC Anniversaries, and others
 - f. Badging and Security access for service/support animals
 - 6.2. Physical Accessibility: FLETC has reviewed physical access to determine any issues with all public-facing elements of FLETC’s services. Review of all required elements including devices or equipment needed for programmatic access, accessible vehicles for tours, paths of travel, and egress into and out of buildings have been performed. Consideration for sidewalks, ramps, doors, restrooms, eating facilities, and any other areas where the public may have access were evaluated to ensure compliance. Modifications for facilities are noted in Appendix A.
 - 6.3. Facility Security and Parking: The Self-Evaluations reflected that not all Visitor/Security Buildings have accessible counters for visitors and that many of the doors require upgrades to meet federal accessibility standards. Modifications are noted in Appendix A.

- 6.4. Dining Facilities: FLETC's Self-Evaluations reflected several upgrades needed to ensure that the dining facilities are accessible to individuals with disabilities. Modifications are indicated in Appendix A.
- 6.5. FLETC-provided Transportation: The FLETC sites provide transportation for visitors who are touring. At least one transportation vehicle is wheel chair accessible.
- 6.6. Tours of the FLETC Sites: FLETC provides tours for numerous companies, groups, and entities from federal, state, local, tribal, and territorial agencies. Current practice requires tour requestors to coordinate with the PCO and complete a form, which includes a section on accessibility accommodation needs.
- 6.7. Training Security Personnel: Contract security personnel are responsible for badging and vehicle access for members of the public visiting FLETC sites. Training is provided to security staff regarding access for service/support animals that may accompany visitors.
- 6.9. Accessibility Accommodation Procedures: With the exception of tours, requests for accessibility accommodations for public visitors generally are from students on behalf of their guests for graduation ceremonies. These requests are handled and processed through coordination between the training divisions and EEO. Requests for sign language interpreters or assistive devices for hearing or mobility are handled in advance through EEO. When graduation ceremony coordinators receive requests for interpreters, assistive hearing devices, or mobility devices, these requests are coordinated with EEO.
- 6.10. FLETC.GOV: PCO handles FLETC communications with the public, including information posted to the public website. The DHS Directive, FLETC Accessibility Plan, interaction procedures, accessibility request procedures, and complaint procedures will be posted to the public web site by September 30, 2019. The web site will include links to the DHS Disability Access web site and any relevant resources and publications.
- 6.11. Auxiliary Aides: Each FLETC site has an Ubi-Duo for deaf visitors and the auditoriums have assistive devices for the hard of hearing. Requests for these devices are handled in advance through coordination between the training divisions and EEO. FLETC EEO has a sign language interpretation contract in place to provide qualified interpreters when needed for events.

Federal Law Enforcement Centers (FLETC) Identified Public-Facing Facilities						
Location	Bldg. #	Bldg. Type	Identified Issues	Est. Costs	Projected Completion Dates	POCs
Artesia	22	Security Bldg.	No accessible counter, not enough accessible parking spaces, paths of travel need improvements	\$20,000.00	Use FY2020 Unplanned project for OSPR request or FY2021 O&S list	Wright ¹ , Wilbourn
Total Cost				\$20,000.00		
Charleston	61	Auditorium inside main classroom building	Parking Ramp re-build and design for Auditorium re-build	\$300,000.00	FY2020 O&S list line 52	Hill ² , Blankenship
	642	Security/Visitor Center	Front counter height/modification to impact glass, and modifications to exterior ramp and stairs	\$175,000.00	FY2020 O&S list line 52	Hill ³ , Blankenship
Total Cost				\$475,000.00		
Cheltenham	1	Staff Offices/ Classroom	Ramp handrails and doors need to be updated to meet standards	\$33,000.00	Funded FY2019 O&S	Shaner ⁴ , Braun
	6	Visitors Center	Door hardware needs to be upgraded to meet standards	\$20,000.00	Funded FY2019 O&S	Shaner ⁵ , Braun

¹ Woody Wright, Chief Office of Artesia Administration and Allan Wilbourn, Branch Chief, Master Plan Construction

² Glenn Hill, Lead Facilities Operations Specialist, and Jeff Blankenship, Environmental Protection Specialist

³ Glenn Hill, Lead Facilities Operations Specialist, and Jeff Blankenship, Environmental Protection Specialist

⁴ Mark Shaner, Supervisor, Facilities Operations Specialist and Todd Braun, Environmental and Safety Specialist

⁵ Mark Shaner, Supervisor, Facilities Operations Specialist and Todd Braun, Environmental and Safety Specialist

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Federal Law Enforcement Centers (FLETC) Identified Public-Facing Facilities						
Location	Bldg. #	Bldg. Type	Identified Issues	Est. Costs	Projected Completion Dates	POCs
	50	FLETC/Partner Organization Offices	Door hardware needs to be upgraded to meet standards	\$87,000.00	Funded FY2019 O&S	Shaner ⁶ , Braun
Total Cost				\$140,000.00		
Glynco	1	Visitor Center	Missing lav guards, exposed plumbing, does not have dual water fountains, ramp handrails not compliant.	\$22,300.00	FY2020 O&S list line 53	Wright-Mobius ⁷ , Marshall
	75	Dining Hall	Doors are not accessible, protruding elements, paths of travel are not firm and stable, water fountains are not compliant, counters are not accessible.	\$320,000.00	September 2022	Wright-Mobius ⁸ , Marshall
	86	FLETC Express/Credit Union/Meditation Room	More accessible parking spaces required, not all entrance doors are compliant, plumbing is exposed, counter(s) not compliant.	\$50,000.00	FY2020 O&S list line 53	Wright-Mobius ⁹ , Marshall
	215	Simulations Laboratory	Has latch door handles, no accessible push button for entrance, has protruding elements.	\$19,000.00	September 2023	Wright-Mobius ¹⁰ , Marshall

⁶ Mark Shaner, Supervisor, Facilities Operations Specialist and Todd Braun, Environmental and Safety Specialist

⁷ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

⁸ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

⁹ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

¹⁰ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

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Federal Law Enforcement Centers (FLETC) Identified Public-Facing Facilities						
Location	Bldg. #	Bldg. Type	Identified Issues	Est. Costs	Projected Completion Dates	POCs
	217	Cyber Division	Ramp handrails not compliant, door access is not compliant, have protruding elements.	\$14,500.00	September 2023	Wright-Mobius ¹¹ , Marshall
	221	Indoor Firing Ranges	Have protruding elements, bathrooms do not meet standards, drinking fountains do not meet standards.	\$13,200.00	September 2024	Wright-Mobius ¹² , Marshall
	260	Student Center	Additional accessible parking spaces needed, ramp grade may need to be corrected, railings do not meet standards, entrance into doors not accessible, toilet paper dispensers too high, exposed plumbing, counter top(s) are too high.	\$72,190.00	FY2020 O&S list line 53	Wright-Mobius ¹³ , Marshall
	811	Intermodal Training Facility	All exterior doors need pressure adjustments to meet standards, first floor has fully accessible restroom, second floor on ambulatory accessible.	\$165,000.00	September 2024	Wright-Mobius ¹⁴ , Marshall

¹¹ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

¹² Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

¹³ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

¹⁴ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

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Federal Law Enforcement Centers (FLETC) Identified Public-Facing Facilities						
Location	Bldg. #	Bldg. Type	Identified Issues	Est. Costs	Projected Completion Dates	POCs
	890	Forensics Science Training Complex	Need additional accessible parking, entrance and restroom doors need pressure adjustments, protruding elements, plumbing is exposed, assembly area does not meet standards.	\$20,000.00	September 2023	Wright-Mobius ¹⁵ , Marshall
Total Cost				\$696,190.00		
Total Cumulative Cost all four sites:				1,331,190.00		

¹⁵ Deborah Wright-Mobius, Branch Chief, Real Property, and Eric Marshall, Branch Chief, Design Construction, Facilities Management Division

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