



## Office of Nuclear Material Safety and Safeguards Procedure Approval

### **Management of Agreement State Program Performance Concerns State Agreements (SA) Procedure SA-400**

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Issue Date: 09/29/2022

Review Date: 09/29/2027

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Kevin Williams  
Director, NMSS/MSST

Clark, Theresa signing on behalf  
of Williams, Kevin  
on 09/29/22

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Brian C. Anderson  
Branch Chief, NMSS/MSST/SLPB

Signed by Anderson, Brian  
on 09/15/22

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Jeffery Lynch  
Procedure Contact, NMSS/MSST/SLPB

Signed by Lynch, Jeffery  
on 10/03/22

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**ML22243A239**

**NOTE**

**Any changes to the procedure will be the responsibility of the NMSS Procedure Contact.  
Copies of NMSS procedures are available through the NRC Web site at <https://scp.nrc.gov>**

## **I. INTRODUCTION**

- A. This document describes the process by which the U.S. Nuclear Regulatory Commission (NRC) Office of Nuclear Material Safety and Safeguards (NMSS) coordinates concerns regarding the performance of State regulatory bodies or their personnel, and concerns regarding potential wrongdoing committed by State regulatory personnel.
- B. As used in this document, the term “Agreement State Program Performance Concern” (ASPPC) refers to a concern involving State regulatory bodies that oversee the activities of Agreement State licensees and include concerns regarding the performance of such State regulatory personnel. An ASPPC can also include concerns regarding potential wrongdoing committed by State regulatory personnel. The term “wrongdoing” refers to a willful failure to adhere to State or NRC regulatory requirements.
- C. As used in this document, the term “concerned individual” refers to the person or organization that submits an ASPPC to the NRC. Anonymous concerns are accepted; additional information is provided on identity protection in Section V.B. of this procedure.
- D. Concerns involving Agreement State licensees are discussed in Management Directive (MD) 8.8, *Management of Allegations*, and associated Handbook 8.8 (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML15344A045](#)) under Section II, “*Allegation Process*,” item D., “*Concerns Involving an Agreement State Licensee*.”

## **II. OBJECTIVES**

- A. To provide guidance to NMSS staff on the receipt, review, and coordination of ASPPCs.
- B. To provide guidance for use by the Agreement States on their responsibilities related to the resolution of ASPPCs.
- C. To ensure that ASPPCs are handled by an established process.

## **III. BACKGROUND**

Management Directive 8.8, *Management of Allegations* ([ML15344A045](#)) establishes the NRC’s policies, and procedures for handling allegations concerning NRC-regulated activities. Management Directive 8.8 defines an allegation as a declaration, statement, or assertion of impropriety, or inadequacy associated with NRC-regulated activities, the validity of which has not been established. Excluded from this definition are performance or wrongdoing concerns regarding organizations or personnel from State regulatory bodies that oversee Agreement State licensee activities.

Management Directive 8.8 directs NRC staff to refer concerns regarding the performance of State regulatory bodies or their personnel and concerns regarding potential wrongdoing committed by State regulatory personnel to NMSS.

On August 11, 1998, the NRC Executive Director for Operations issued SECY-98-192, "Resolution of Allegations Concerning the Performance of Agreement State Programs" (ML992870058). In this Commission paper, the staff recommended that staff handle concerns about Agreement State performance or wrongdoing by transferring them to the Agreement State, rather than treating the concerns as allegations.

The Commission approved a modified version of the staff's recommendation as noted in a December 8, 1998, Staff Requirements Memorandum for SECY-98-192 ([ML003755405](#)). Under the Commission's approved approach, absent a credible health and safety concern, Agreement State program performance concerns or wrongdoing concerns involving a Radiation Control Program Director (RCPD) would be referred to the Agreement State Inspector General (IG), Attorney General (AG), or senior line management above the RCPD level, as appropriate, based on a decision by staff using criteria to be developed, without the need to enter the allegation process.

#### **IV. ROLES AND RESPONSIBILITIES**

- A. Director<sup>1</sup>, Division of Materials Safety, Security, State, and Tribal, Programs (MSST):
1. Oversees the management of the ASPPC program in NMSS in accordance with this procedure.
  2. Serves as chairperson (or designates an acting chair) of the State Concerns Review Board (hereon referred to as a "review board"). As review board chairperson, ensures that safety significance, resolution plan, and review priority are considered.
  3. Approves and signs all ASPPC referral letters, closure memos, and closure letters to concerned individuals, with review and concurrence by the cognizant Branch Chief, ASPPC coordinator, and OGC (if directed by the review board).
- B. Branch Chief, State Agreement, and Liaison Programs Branch (SLPB), MSST:
1. Ensures that staff members are familiar with the policies and procedures outlined in this guidance.
  2. Assigns a staff member to serve as the ASPPC coordinator.
  3. Assigns a technical staff member as lead technical reviewer for ASPPCs.
  4. Ensures that the lead technical reviewer is available to brief the review board on the concerns.
  5. Approves and concurs on all ASPPC correspondence.

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<sup>1</sup> These functions are typically carried out by the Deputy Director. Consistent with NMSS Procedure 10-04-01 (ML210657A227; non-public), the signature authority delegated to Division Directors may be exercised by their deputy directors, except where expressly prohibited.

C. ASPPC Coordinator:

1. Administers the ASPPC review program in NMSS, in accordance with this guidance.
2. Serves as a member of the review board and assists the chair of the review board, as necessary.
3. Maintains the official agency files on ASPPCs, including establishing a file record, and assigning a control number. (Similar to allegations, and as specified in MD 8.8, ASPPC documentation shall not be processed or recorded in the ADAMS or any other electronic location with the potential for public access.)
4. Provides advice, guidance, and assistance to NMSS management, review board members, and NMSS staff in implementing the policies, and procedures outlined in this guidance.
5. Serves as the primary point of contact for all ASPPCs.
6. Drafts all NMSS correspondence involving ASPPCs. Ensures the letters do not compromise the identity of the concerned individual.
7. Prepares reports to MSST and NMSS senior management on the status of ASPPCs, as needed.
8. Provides information to concerned individuals regarding ASPPC follow-up and resolution.
9. Approves and signs acknowledgment letters, with concurrence from lead technical reviewer and the cognizant Branch Chief.
10. When requested, provides data to the Integrated Materials Performance Evaluation Program (IMPEP) team leader on concerns involving Agreement State licensee(s) that were referred to the States for review under the Common Performance Indicator, [Technical Quality of Incident and Allegation Activities](#).
11. Convenes the review board, including NMSS management, OGC, and the appropriate Regional State Agreements Officer (RSAO).

D. Lead Technical Reviewer:

1. Prepares the concerns review board summary sheet, which will include the concerns list and proposed resolution plan.
2. Using the concerns review board summary sheet, briefs the review board on the concerns, the potential safety significance, the proposed resolution plan, and schedule.
3. Provides input, as needed, to ASPPC correspondence.

- E. All NRC Employees:
1. Maintain a working knowledge of the policies and procedures in this guidance.
  2. Record the receipt of any ASPPC in as much detail as possible. Provide all information about the concerns directly to the ASPPC coordinator within 5 days of receipt. Record and provide to the ASPPC coordinator all contacts with concerned individuals during and following resolution of the ASPPC.
  3. Protect the identity of concerned individuals in accordance with policies and procedures outlined in this guidance. The identity of the concerned individual should only be provided to the ASPPC coordinator.
  4. Ensure that ASPPC-related correspondence receives appropriate limited distribution (i.e., is not placed in ADAMS or docket files).
  5. Consult the ASPPC coordinator to determine whether a matter involving Agreement States should be considered as a potential ASPPC.
- F. Regional State Agreements Officers
1. Issues referral letter to the applicable Agreement State outlining the concern and any related specifics.
  2. Participates in a review board, when convened if needed, to address various ASPPCs.
  3. Contacts appropriate Agreement States, when follow-up information is necessary (including lead technical staff in conversations, as appropriate), to determine the status of concerns forwarded to the Agreement State for review and action.
- G. Office of the General Counsel (OGC)
1. Participates in the review board.
  2. Reviews referral letters to the State, closure memos and letters, and other correspondence, if OGC review is determined to be necessary by the review board.

## **V. GUIDANCE**

- A. Processing Concerns Involving Agreement State Oversight
1. Concerns involving State regulatory bodies and State employees that oversee the activities of Agreement State licensees (i.e., ASPPCs) received by NMSS staff should be forwarded to the ASPPC coordinator within 5 days of receipt and are not processed as NRC allegations. These include:

- a. Concerns regarding the performance of such State regulatory bodies or their personnel.
  - b. Concerns regarding interpretation and implementation of the State's regulatory requirements.
  - c. Concerns regarding potential wrongdoing committed by State personnel.
2. An acknowledgment letter will be sent to the concerned individual within 10 days of receipt by the ASPPC coordinator. If it is anticipated that it will take longer than 10 days to respond to the concerned individual, an initial response (phone or e-mail is acceptable) should be provided to the concerned individual acknowledging the concern and indicating that additional NRC feedback is forthcoming. A formal acknowledgement letter should be sent as soon as reasonably achievable.
  3. The ASPPC coordinator, in coordination with the SLPB Branch Chief, will assign a lead technical reviewer for the concern to determine safety significance and to review the concern against the referral criteria. If additional information is needed from the concerned individual, the lead technical reviewer will work with the ASPPC coordinator to discuss with the concerned individual.
  4. A review board will be convened within 30 days of receiving the concern. When a concern involves an overriding safety issue, a review board should be held as soon as possible
    - a. A review board consists of a chairperson (Director, MSST, or designee), SLPB Branch Chief, lead technical reviewer, an OGC representative, RSAO, and the ASPPC coordinator.
    - b. The review board will determine if a special evaluation or other actions, as deemed appropriate, should be initiated when significant, valid safety concerns have been identified, and brought to the attention of the NRC through an external source. NOTE: In the case of an emergency that presents danger to public health and safety, if immediate action appears necessary, the NRC could implement SA-112, *Emergency Suspension of a 274b. Agreement* ([ML20090A370](#)).

**B. Concerned Individual's Identity Protection When Making Referrals to Agreement States**

Before making any referrals to an Agreement State, staff should determine the ability of the State to protect the identity of the concerned individual in coordination with the RSAO. When contacting the concerned individual, staff should inform the concerned individual of the NRC's plans to refer the concern(s) to the State, inform the concerned individual of the State's ability to protect his or her identity from public release, and inquire whether the concerned individual wishes for their identity to be released to the State. Staff should encourage concerned individuals to provide their contact information to States, so that States can follow-up with the concerned individual with detailed questions. Even if the concerned individual elaborates on their concerns with the State, staff (after receiving input from the State) will send a closeout letter/email to the concerned individual.

**C. Referral Criteria for Concerns Involving Agreement State Oversight**

**1. Referrals to the RCPD**

- a. General performance concerns involving the Agreement State program should be initially referred to the RCPD.
- b. Performance or wrongdoing concerns involving Agreement State employees reporting to the RCPD should also be referred to the RCPD.

**2. Referrals to Senior Management above the RCPD**

- a. Performance or wrongdoing concerns involving the Agreement State RCPD should be referred to senior management above the RCPD.
- b. Performance or wrongdoing concerns involving the Agreement State program or employees, that were previously referred to the RCPD, and which have not been appropriately addressed (as determined by the review board), should be referred to senior management above the RCPD. The NRC RSAO should also be notified.

**3. Referrals to State IG or AG**

- a. Alleged employee wrongdoing or performance concerns involving the Agreement State program or employees, that were previously referred to Senior Line Management above the RCPD, and which have not been appropriately addressed (as determined by the review board), should be referred to the State IG, State AG, or equivalent.
- b. Alleged wrongdoing or performance concerns involving Senior Line Management above the RCPD should be referred to the State IG, State AG, or equivalent. The NRC RSLO and RSAO should also be notified.
- c. Concerns regarding employee wrongdoing, or performance involving an Agreement State program that has demonstrated a disregard for

investigating and handling referred concerns should be referred to the State IG, AG, or equivalent.

**D. Follow-up and Closure of ASPPCs**

All referral letters to the State should request a response within 60 days. After the referral to the State is completed and the State has responded, the lead technical reviewer will review the response, and provide documentation to the ASPPC coordinator for a closure letter to the concerned individual or a memorandum to file within 15 days of receipt. Upon the discretion of the review board, the IMPEP coordinator, and IMPEP team lead, Agreement State program concerns transferred to the RCPD should be addressed at the time of the next periodic meeting or IMPEP review of the Agreement State.

If after 60 days no response is received from the State, follow-up should be made by the RSAO. If after 10 days no response is received from the State, a letter should be sent to the State requesting a response within 10 days. If the response has not been received within 10 days, the original request that was made to the RCPD should then be forwarded to the Senior Line Management above the RCPD for action. Alternatively, if the original request was made to the Senior Line Management, it should then be forwarded to the State AG, or IG, as appropriate. If the original request was made to the State AG or IG, and there is no response, then the concern should be considered by NMSS management to determine whether additional correspondence or an IMPEP review regarding the issue (which would need Management Review Board approval) is warranted.

The concerned individual should be informed of the status of the referral to the State 180 days after submittal of the concern.

**E. Contact Information**

The ASPPC program is administered by the ASPPC coordinator located in MSST. The ASPPC Coordinator can be contacted via e-mail at:  
[AgreementStateConcern.Resource@nrc.gov](mailto:AgreementStateConcern.Resource@nrc.gov).

**VI. REFERENCES**

NMSS SA Procedures are available at: <https://scp.nrc.gov/procedures.html>

Management Directives are available at: <https://scp.nrc.gov/procedures.html>

Sample correspondence, referral letters, and resolution plan is available at:  
<https://scp.nrc.gov/>



**VII. Appendices**

Appendix A: Agreement State Program Performance Concern Timeline

Appendix B: Sample Acknowledgement Letter to Concerned Individual

Appendix C: Sample Letter to Agreement State

Appendix D: Sample Closure Memo to ASPPC File

Appendix E: Sample Closure Letter to Concerned Individual

Appendix F: Sample Concern Review Board Summary Sheet

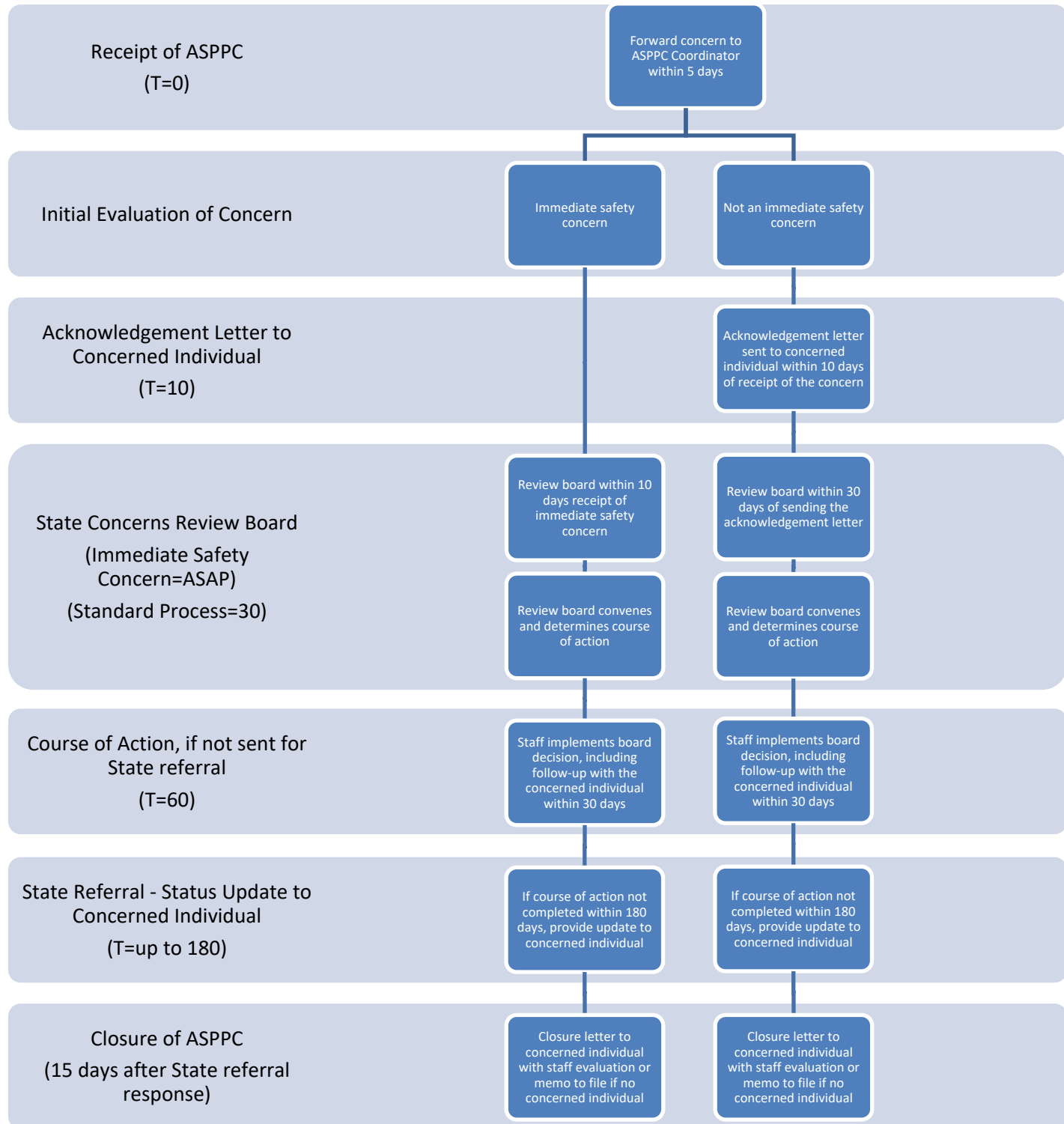
**VIII. ADAMS REFERENCE DOCUMENTS**

For knowledge management purposes, all previous revisions of this procedure, as well as associated correspondence with stakeholders, that have been entered into ADAMS are listed below.

<b>No</b>	<b>Date</b>	<b>Document Title/Description</b>	<b>Accession Number</b>
1	06/21/99	SP-99-042, Draft OSP Procedure SA-400, "Management of Allegations"	ML072010241
2	01/22/01	STP Procedure SA-400, Management of Allegations,	ML010720480
3	03/11/11	FSME-11-022, Opportunity to Comment on Draft Revision to FSME Procedure SA-400 "Management of Agreement State Performance Concerns and Allegations"	ML102770172
4	03/11/11	Summary of Comments on SA-400, Allegations	ML14203A646
5	04/10/15	STC-15-026, Opportunity to Comment on Draft Revision to Office of Nuclear Material Safety and Safeguards Procedure SA-400, "Management of Agreement State Program Performance Concerns"	ML14203A643
6	8/11/98	SECY-98-192, Resolutions of Allegations Concerning the Performance of Agreement State Programs	ML992870058
7	12/8/98	Staff Requirements Memorandum, SECY-98-192 - Resolution of Allegations Concerning the Performance of Agreement State Programs	ML003755405
8	3/17/21	STC-21-013, Opportunity to Comment on Draft Revision to Office of Nuclear Material Safety and Safeguards Procedure SA-400, "Management of Agreement State Program Performance Concerns"	ML21060B518

9	6/16/21	NMSS SA-400, Management of Agreement State Program Performance Concerns	ML16203A470
10	09/29/22	SA-400, Management of Agreement State Program Performance Concerns	ML22243A239

**Appendix A: Agreement State Program Performance Concern Timeline**



**Appendix B: Sample Acknowledgment Letter to Concerned Individual**

[MONTH DAY, YEAR]

[RECIPIENT]

Sent via email to: [EMAIL]

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION (NRC) ACKNOWLEDGMENT LETTER  
DOCUMENTING CONCERNS REGARDING [CONCERN] – [ASPPC No.]

Dear [CONCERNED INDIVIDUAL]:

This letter documents and acknowledges the concerns you shared with [ASPPC COORDINATOR] by [MEANS OF COMMUNICATION] on [DATE]. In your communications, you were concerned with [BRIEF DESCRIPTION OF CONCERN].

The enclosure to this letter documents your concerns. If the enclosure is not accurate, please contact me as soon as possible, and preferably within 15 days of the date of this letter. I want to ensure that the NRC fully understands your concerns, so they are appropriately described and adequately addressed prior to the completion of our review.

[STATE] entered into an Agreement with the NRC on [DATE]; [IF APPLICABLE:] the Agreement was amended on [DATE]. Under the Agreement, the NRC discontinued its authority to regulate certain Atomic Energy Act (AEA) radioactive materials, or Agreement materials, as specified in Section 274b of the AEA. [STATE], as an Agreement State, assumed that authority. Although the NRC no longer has regulatory authority over Agreement materials in [STATE], the NRC maintains an oversight function in accordance with Section 274j(1) of the AEA. This oversight function includes the review of [STATE'S] program adequacy and compatibility.

Thank you for notifying us of your concerns. The NRC intends to evaluate this matter further and will follow up with more details later. Should you have any additional questions, or if the NRC can be of further assistance, please contact me by email at [EMAIL].

Sincerely,

**[SIGNATURE]**

[NAME], Agreement State Program  
Performance Concern Coordinator  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

[ASPPC No.]

Enclosure: Statement of Concerns

**Appedix C: Sample Referral Letter to Agreement State**

[MONTH DAY, YEAR]

[STATE DIRECTOR], Director  
[STATE]  
[ADDRESS]

SUBJECT: REFERRAL OF CONCERNS INVOLVING [STATE] AND [CONCERN] – [ASPPC No.]

Dear [STATE DIRECTOR]:

The U.S. Nuclear Regulatory Commission (NRC), Office of Nuclear Material Safety and Safeguards, has received information from a concerned individual regarding [BRIEF DESCRIPTION OF CONCERN]. [NUMBER] specific concern(s) are summarized in the enclosed Statement of Concern(s). These concerns were [METHOD OF TRANSMITTAL AND TIME TRANSMITTED] [IF APPLICABLE:] and have been discussed informally with your staff. They are being formally referred to you now under the Agreement State Performance Concerns process, as described in State Agreements (SA) Procedure SA-400, "Management of Agreement State Performance Concerns" ([ML21060B563](#)), to ensure that appropriate actions are taken, and that the state's response is documented.

Please respond to these issues within 60 days via email to our Agreement State Program Performance Concern Coordinator, [NAME], at: [\[EMAIL\]](#). In your response, please include the tracking number, [ASPPC No.]. Should you have any additional questions, or need additional time to respond to this letter, please contact [ASPPC COORDINATOR], at [PHONE NUMBER].

The concerned individual is aware that the NRC is referring their concern regarding the [STATE DEPARTMENT] to you. [IF APPLICABLE:] They have agreed to allow us to provide their contact information in case you need additional information. [NAME] can be contacted by e-mail at [\[EMAIL\]](#) and by telephone at [PHONE NUMBER].

Sincerely,

**[SIGNATURE]**

[NAME], Director  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: Statement of Concerns

cc: [CONCERNED INDIVIDUAL], [\[CONTACT INFORMATION\]](#)

**Appendix D: Sample Closure Memo to ASPPC File (usually for anonymous concerns)**

[DATE]

MEMORANDUM TO: Agreement State Program Performance Concern (ASPPC) File  
[ASPPC No.]

FROM: [ASPPC COORDINATOR], Agreement State Program Performance Concern Coordinator

SUBJECT: CLOSURE OF AGREEMENT STATE PROGRAM PERFORMANCE CONCERN [ASPPC  
No.] REGARDING [STATE PROGRAM]

On [DATE], Office of Nuclear Materials Safety and Safeguards, [DIVISION] staff, [NAME(S)] [MEANS  
OF RECEIPT OF ASPPC.] [BRIEF DESCRIPTION OF CONCERN.]

NRC staff reviewed the technical details – [IDENTIFY DETAILS], and determined that  
[DETERMINATION]. [MEANS OF DETERMINATION.] [BRIEF DESCRIPTION OF METHODOLOGY.]

The NRC staff requests that [this/these] issue[s] be examined during the next Integrated Material  
Performance Evaluation Program (IMPEP) review which will occur in [YEAR] and [has/has not]  
currently been scheduled. The NRC staff requests that the IMPEP team evaluate the [STATE  
PROGRAM] with regard to [SPECIFIC ARTICLES TO EXAMINE] with regard to the technical aspects  
of this issue.

**Appendix E: Sample Closure Memo to Concerned Individual**

[DATE]

[CONCERNED INDIVIDUAL]

Sent via email to:

[CONCERNED INDIVIDUAL EMAIL]

**SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION (NRC) RESPONSE TO CONCERNS  
REGARDING [BRIEF TITLE] [ASPPC No.]**

Dear [CONCERNED INDIVIDUAL],

This response addresses the concerns you provided [MEANS OF TRANSMITTAL] on [DATE], concerning the [PROGRAM]. You explained those concerns in further detail to [NAME(S)] on [DATE]. This concern was identified in an acknowledgment letter that sent you on [DATE].

The attached enclosure responds to your concerns. The NRC's regulatory authority, by law, is limited to only those areas over which the NRC has jurisdiction and have not been discontinued under the NRC's Agreement with the [STATE] in accordance with the Atomic Energy Act of 1954, as amended, Section 274b. [BRIEF EXPLANATION OF WHERE THE CONCERN FALLS AND HOW IT WILL BE ADDRESSED.]

Thank you for notifying us of your concerns. Should you have any additional questions, or if the NRC can be of further assistance, please contact me by phone at [ASPPC COORDINATOR PHONE] or by email at [ASPPC COORDINATOR EMAIL].

Sincerely,

**[SIGNATURE]**

[NAME], Director  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

[ASPPC No.]

Enclosure:  
Statement of Concerns and NRC Responses

**Appendix F: Sample Concern Review Board Summary Sheet**

<p><b>Concern Review Board (CRB) Summary Sheet</b>                  Agreement State Program Performance Concern: NMSS-XXXX-AS-XXXX</p>			
Facility Name:			
Responsible Division:		Concern Review Board (CRB) Date:	
Overall Responsible Branch:		TECHNICAL STAFF:	

CRB PARTICIPANT ROLE	CRB PARTICIPANT
CRB Chairman:	
Coordinator:	
Office of General Counsel:	
Technical Lead:	
Branch Chief:	
Region:	

Purpose of this CRB:						
Basis for a Subsequent CRB:						
Does the Concerned Individual (CI) <b>OBJECT</b> to providing their contact information to the State?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA
Does the CI <b>OBJECT</b> to the NRC requesting that the State formally assess/evaluate the concern(s)?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA
If any of the following factors apply, this concern shall <b>not</b> be submitted to a State or licensee for investigation or review.						
<input type="checkbox"/>	Information cannot be released in sufficient detail to the licensee or State without compromising the identity of the concerned individual (and the concerned individual request's identity protection).					
<input type="checkbox"/>	The licensee could compromise an investigation or inspection because of knowledge gained from the discussions.					
<input type="checkbox"/>	The concern involves the State's management or those parties who would normally receive and address the concern.					
<input type="checkbox"/>	The basis of the concern is information received from a Federal or State agency that does not approve of the information being released.					



## Concern Review Board (CRB) Summary Sheet

Agreement State Program Performance Concern: NMSS-XXXX-AS-XXXX

**Concern:**

(A concern is one or two sentences.)

**Concern: Background, Supporting Information, & Comments:**

**Regulatory Requirement:** NA

\*Safety Significance:

HIGH

Normal

N/A

**Basis:** Describe the concern's safety significance below (current, on-going issue; level of individual(s) involved; etc.)

### Technical Staff Recommendation(s)

Date	*Recommended Action	Assigned Branch	Planned Date
	Review Acknowledgement Letter; and perform Compatibility Review of the regulation and legislative statutes to determine validity of CI's statements		
	Determine path forward		

*NOTE: Attach Draft questions/requests, etc. as a separate document if necessary.*

CRB Date	CRB Decision(s)	Assigned to	

**Concern Review Board (CRB) Summary Sheet**  
Agreement State Program Performance Concern: NMSS-XXXX-AS-XXXX

<b>Concern:</b>			