**Company:** Carson’s Consulting  
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**Report Name:** Carson’s Consulting Audit  
**Report Description:** Carson’s Consulting administrative remedies and settlement compliance audit  
**Report Date:** October 26, 2025

**Entity Name: Carson’s Consulting**

**Controlset Name:** 10 CFR 13.46 – Compromise or Settlement  
**Report Name:** Compliance Audit Report for Carson’s Consulting  
**Entity / Business Unit:** Carson’s Consulting – Legal & Regulatory Affairs  
**Controlset Name:** Program Fraud Civil Remedies Standard

Carson’s Consulting’s compliance audit found **multiple deficiencies** with respect to the requirements of **10 CFR 13.46**, which governs compromise or settlement of claims under the Nuclear Regulatory Commission’s Program Fraud Civil Remedies rules. Internal reviews revealed that **several settlement offers were executed without timely notification to the Attorney General**, and that **some settlement agreements lacked full written documentation or proper authority sign-off**. Additionally, **recordkeeping for settlement timelines and notifications was incomplete**, raising concerns about procedural transparency and control effectiveness. Immediate remediation is required to ensure future compliance and audit readiness.

| **#** | **CFR Reference** | **Requirement Description** | **Compliance Status** | **Evidence Summary** | **Evidence Document** | **Frequency** | **Status** | **Responsible Team** | **Recommended Action** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1 | **13.46(a)** | Parties may make offers of compromise or settlement at any time. | **Compliant** | Offers are properly recorded; however, some lacked timely follow-through documentation. | Settlement\_Offers\_Log\_CC\_10.26.2025.xlsx | Per-case | **On Track** | Legal & Compliance Team | Maintain tracking log with automated timestamps. |
| 2 | **13.46(b)** | Reviewing official has exclusive authority to settle and must notify Attorney General at least 30 days before settlement. | **Non-Compliant** | At least 3 cases lacked evidence of timely AG notification before execution. | Notification\_Correspondence\_CC\_10.26.2025.pdf | Per-case | **Overdue** | Legal & Compliance Team | Implement workflow requiring verified AG notification before any settlement. |
| 3 | **13.46(c)–(f)** | Authority-head / Attorney General roles; settlement must be in writing and properly authorized. | **Non-Compliant** | Two agreements were unsigned or missing final approval forms. | Settlement\_Agreements\_CC\_2025.zip | Per-case | **Overdue** | Legal & Compliance Team | Reinforce approval protocol and store signed copies in central repository. |

**Master Deadline Summary Table**

| **Task** | **Category** | **Frequency** | **Status** | **Responsible Team** | **Recommended Action** |
| --- | --- | --- | --- | --- | --- |
| Review and document settlement offers | Settlement Offers | Per-case | **On Track** | Legal & Compliance Team | Ensure follow-up documentation for all offers. |
| Notify Attorney General / equivalent | External Notification | Per-case | **Overdue** | Legal & Compliance Team | Require pre-settlement confirmation of AG notification. |
| Execute written settlement agreements | Documentation | Per-case | **Overdue** | Legal & Compliance Team | Enforce authority-head signature policy and secure digital repository storage. |

**Sorted by Status Precedence:**

* **Overdue:** Notifications and documentation.
* **On Track:** Offer documentation.
* **Missed:** None.
* **Unknown:** None.

**Compliance Summary**

* **§ 13.46(a) – Offers of Compromise:** Mostly compliant but lacks consistent tracking confirmation.
* **§ 13.46(b) – Notification to Attorney General:** **Non-compliant** — missed notification deadlines observed in multiple cases.
* **§ 13.46(c)–(f) – Written Authorization and Sign-off:** **Non-compliant** — incomplete approvals and missing final signatures.

**Urgency:** **High – Immediate corrective actions required** to align with 10 CFR 13.46(b) and (c).  
**Overall Determination:** **Not Compliant with 10 CFR 13.46.**

**Raw Excerpts from Evidence Documents**

* **Notification Correspondence:** Two settlement letters executed April 2025 lacked pre-notification to the Attorney General.
* **Settlement Agreements Archive:** Agreement #CC-2025-004 missing signature of authority head; stored unsigned in digital repository.
* **Internal Audit Log:** Entry dated May 12 2025 indicates verbal authorization only, no written record.

**Checklist Rules for Reference:**

* **§ 13.46(a):** Parties may make offers of compromise or settlement at any time.
* **§ 13.46(b):** Reviewing official must notify the Attorney General in writing at least 30 days prior to settlement.
* **§ 13.46(c)–(f):** Any settlement must be in writing, signed by the proper authority head, and compliant with program standards.

**Date Normalization Conversions:**

* Notifications normalized to ISO 8601 format; delays calculated against execution date.

**Audit Logs / Metadata:**

* Document Control – Document ID: CCSETTLESTDEVD, Version 1.0, Effective Date: October 26, 2025.